EXHIBIT 4

MASSACHUSETTS APPEALS COURT VOL. III

VOL. III

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13	COMMON WEARING	
14	APPEALS	COURT
15		
16	M.T.M and D.B	
17		Docket No. 2023-P-1202
18	Appellants,	
19	V.	APPELLANTS' RECORD OF APPENDIX
20	S.H	VOLUME III OF IV
21	Appellee.	
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	APPELLANTS' RECORD OF APPENDIX VO	LUME III OF IV

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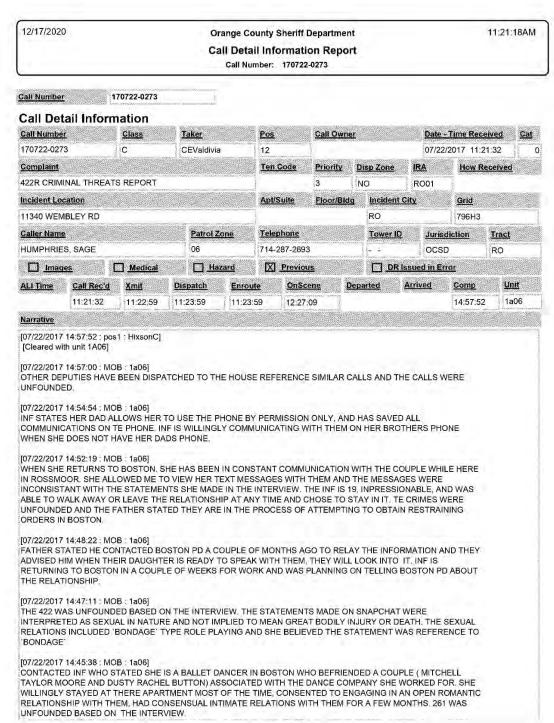
9/13/2023 **Orange County Sheriff Department** 11:33:44AM Call Detail Information Report Call Number: 170528-0691 Call Number 170528-0691 Call Detail Information Call Number Taker Class Call Owner Pos Date - Time Received Cat 170528-0691 G ROSECL 10 05/28/2017 18:28:29 Complaint Priority Disp Zone Ten Code IRA How Received 415F DISTURBANCE-FAMILY DISPUTE 2 NO RO01 WIRE **Incident Location** Apt/Suite Floor/Bldg Incident City Grid 11340 WEMBLEY RD RO 796H3 Caller Name Patrol Zone Telephone Tower ID Jurisdiction Tract HUMPHRIES, MICHAEL 06 562-756-2693 949-511-0580 OCSD RO Images Medical Hazard X Previous DR Issued in Error **ALI Time** Call Rec'd <u>Xmit</u> Dispatch **OnScene** Enroute Departed Arrived Unit Comp 18:28:18 18:28:29 18:30:36 18:30:50 18:30:50 4a08 18:46:04 19:20:26 **Narrative** [05/28/2017 19:20:25 : pos2 : chano] [Cleared with unit 4A08] [05/28/2017 19:19:37 : MOB : 4A08] Spoke with informant who stated daughters ex boyfriend boarded a flight from boston to his home. informant believes his daughter is going to be taken from his home and taken back to boston, spoke with daughter sage who stated there is no validity to the statements made by her father. Sage feels safe and there will be no harm done to her family, sage agreed to travel to Sacramento to visit family. no crime committed. 10-98 [05/28/2017 19:13:52 : pos2 : chano] Unit: 4A08 C4 [05/28/2017 19:05:17 : pos2 : chano] Unit: 4A08 10-6 [05/28/2017 18:48:26 : pos2 : chano] Unit: 4A08 HAVE CONTACT [05/28/2017 18:30:36 : pos10 : ROSECL] Cross streets: SHAKESPEARE DR//CHESNEY DR NBH: 796H3 90720 33.7986273663148,-118.081774826051 INF VS 19 YO DTR IN A 415V INF IS UPSET THAT DTRS FRIENDS FROM BOSTON ARE POSS ENRIE TO THE HOUSE FROM BOSTON PER INF THEY POSS BOARDED A PLANE 8 HRS AGO **Location Comment** NBH: 796H3 90720 33.7986273663148,-118.081774826051 Call Dispositions Date - Time Disposition Unit 05/28/2017 19:19:48 Assist 4A08

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4A08

No Report Needed

05/28/2017 19:20:25



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1 - 311 Snapchat; but, yes, I did go to the police. 2 Q. And you reported what? 3 A. I reported that there was an imminent threat 4 of me potentially being kidnapped; that they were coming to LA. That this was serious. They said 5 that they had a warehouse ready. 6 7 Q. And who did you speak with? 8 A. I spoke with the Orange County Sheriff 9 Department. 10 Q. And anybody in particular? 11 A. I have the information on my phone but not 12 currently with me right now. 13 Q. Did this conversation you had -- with the 14 Orange County Sheriff's Department: is that 15 correct --16 A. Yes. 17 O -- was that reduced to writing? 18 is there a report? A. There is a report, There's a number, 19 20 Q. That memorializes your allegations? 21 A. Yes. 22 Q. Do you have that with you today in court? A. I have the number, but... 23 24 Q. Whe number of what? 25 The number of the police report.

LMP Court Reporting - (508) 641-5801

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PL-0001192

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AFFIDAVIT OF SAGE HUMPHRIES

On or about August 16, 2016, at age 18, I moved away from my family from Southern California to dance under contract with the Ballet. I moved into an apartment in the city with another dancer who eventually moved out in December 2016.

In January of 2017, I became friends with Dusty Button, who was at the time, a veteran principal dancer with the Ballet; 27 years old and married to Mitchell Taylor Moore, aka Taylor Button, 32 years old.

After ending a year-long relationship I had been in with another man from California, I began spending all of my free time with Dusty and/or Taylor. After only a couple weeks of friendship, I was convinced to spend more nights at Dusty and Taylor's apartment (45 minutes away in Somerville), than at my own apartment that was within walking distance of the Ballet.

In the months to follow, Dusty and Taylor would constantly supply me with a bounty of alcohol and Marijuana. Taylor claimed he wanted to, "help." me with my career, like he did his wife's, and soon took ownership of my Instagram, while simultaneously downloading all of my email, phone, and Icloud information.

Taylor soon began to dictate what I could and could not post. Dusty and Taylor began to seriously influence my opinions of those around me, my values, and my beliefs. I was soon discouraged from having any personal relationship with my family members, close friends and even colleagues at the ballet.

In the beginning of March 2017, Taylor began to come on to me very strongly. He told me that he wanted to be closer to me on a physical level although he was married to Dusty. He craved touch, and platonic friendship was not enough for him. I told him that Dusty was my best friend and that I felt uncomfortable with any romantic involvement. After I had made my position clear, he told me he would, "honor my request," because he wanted to be in my life. However, it became apparent to me that he would not honor my request.

Taylor began to touch me underneath the covers when the three of us would go to bed. I felt completely frozen because his wife was laying on the other side of him and I couldn't make a sound. This became a nightly ritual; Dusty would, "fall asleep," and he would begin to touch me.

He soon took it further, seizing an opportunity while Dusty was on a business trip, to begin having sexual relations with me. He told me to, "trust him," because he knew what he was doing. I felt extraordinarily guilty because Dusty was not aware of what was happening. However, Taylor would assure me that Dusty was, "OK," with the situation and would actually welcome it.

At the end of April 2017, Dusty and Taylor said I was their "girlfriend" and started to push odd sexual acts on me. Dusty and Taylor would constantly supply me with a bounty of alcohol and Marijuana. If I didn't want to drink, Taylor would say he would "funnell" drinks down my throat. I was officially their property, and they could order me around as they pleased.

Filed 01/09/25

If there was an argument; Dusty and Taylor manipulated me into believing that their marriage depended upon me and without me they would get a divorce. I soon found myself in a situation that I could no longer control and I was under the influence of their mind control, drugs and alcohol constantly.

There was one instance at the end of April 2017 where Dusty and Taylor blindfolded me with a latex mask, tied me to their living room table, and had sex right next to me. I felt used and helpless as I was unable to move, speak or see.

Shortly after there was another instance when Dusty and Taylor had gotten in a fight about me. I tried to take a shower by myself in an attempt to unwind from the verbal abuse and chaos I had just witnessed. Taylor came into the shower, bent me over and forced himself on me. I went limp, started crying and felt used and abused in that moment,

On or about May 22, 2017, Dusty Button was terminated from the Ballet company. My parents had become very concerned about me as they recognized my attitude had changed and I was no longer making decisions for myself. On May 24, 2017, my parents arrived in Boston to see me but Taylor and Dusty did not tolerate me spending any time with my parents.

On May 25, my parents showed up at the Ballet to help me get away from Dusty and Taylor because they were no longer allowed at the ballet and I would be alone. I remember going to the airport and Dusty yelling at me on the phone and ordering me not to get on any plane with my parents. Taylor was also yelling for me to read the plane tickets to see when they were purchased and to verify a return flight or else I couldn't get on a plane with my parents.

On May 25, 2017, I flew home to Southern California with my parents and I have not returned to Boston.

Taylor has verbally threatened many times to hurt anyone that got in the way of anything he loved. He threatened to slash my ex-boyfriend's throat. He threatened to beat up my father. I believe Taylor deleted messages from my phone by remote access from May 25 to around May 27, 2017.

On May 27, 2017, Taylor and Dusty began to search for friends that I may have in Southern California and even asked one friend to drive many miles to my parent's home to stalk me because I had been, "Kidnaped." My friend watched my home for Taylor and Dusty, but soon saw the deception and shared the information with me and my parents.

I know Taylor and Dusty traveled from Boston to Los Angeles after my last day in Boston, May 25, 2017, to stalk me.

I now know that Taylor had downloaded all of my private electronic information on my cell phone and that he could actually remotely search my cell phone and my accounts.

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I believe that Taylor deleted information from my phone the day my parents took me home from Boston. I believe that Taylor and Dusty then flew to Southern California themselves in an attempt to get me. My parents called 911 in Southern California and officers responded.

I know that Taylor and Dusty wanted to take me out of the country this summer and had every detail planned for my life. They told me that a life with them would be full of freedom, but I now realize that it was just the opposite.

I know Taylor and Dusty have a violent side to them and that their apartment in Boston has multiple semi automatic weapons and hand guns hanging in their gun room. Taylor has bragged often to me that he can interchange the parts of these guns. Taylor also has many knives.

In the beginning of July, 2017, Taylor has threatened to kidnap me, throw me in the back of his car, take me to a rented warehouse that he got in advance, suspend me from the ceiling, fuck me until I was uncomfortable, and put a cloth over my mouth to make me pass out.

On or about July 18 or 19th, Dusty appeared in an interview that was previously recorded of her in Australia a few weeks prior where she said the "warehouse" is in place. Dusty communicated to me before I viewed the video that she wore a special shirt for me and I think she wanted me to be intimidated by the subliminal message. Dusty and Taylor enjoy using social media to harass and intimidate whenever possible.

From July 25 thru July 27, 2017, Dusty and Taylor have been in Los Angeles stalking me.

I believe Dusty and Taylor would lash out and try to harm me or my family, if any of us were to be in contact with them.

I plan to return to Boston Ballet to dance, but I do not want to put my safety at risk, as well as those around me.

I also since learned, that I am not the only young dancer who has been victimized by Taylor and Dusty; and that the methods in which they lured me in seems to be a pattern.

I declare under penalty of perjury that all statements of fact made above are true to the best of my knowledge.

ateu. 9 1 1 1

Witnessed by

Print name of witness:

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IT IS FURTHER ORDERED that Defendants' surrender of all materials to Humphries' counsel does not preclude future use of such information in Defendants' defense of this action; provided, however, that use must either be agreed upon or approved by the Court.

IT IS FURTHER ORDERED that Humphries' counsel's request for an award of fees and costs associated with bringing the Sanctions Motion is GRANTED.

IT IS FURTHER ORDERED that Humphries' counsel must submit a memorandum of fees and costs associated with bringing the Sanctions Motion detailing the activities, hours spent (in tenths of hours), and the rate charged by each attorney and non-attorney who worked on the Motion and related filings. Appropriate redactions from billing records for attorney client privilege and/or work product may be the for the public filing with non-redacted copies with records filed under seal. Hamphries' counsel shall submit its memorandum within fourteen (14) days of the Order. Defendants have 14 days to file a response, if any is desired. No reply shall be permitted.

IT IS FURTHER ORDERED that Plaintiff Sage Humphries' Motion to Supplement Motion for Sanctions (ECF No. 91) is DENIED as moot.

ELAYNA'J. YOU

DATED this 1st day of December, 2022.

UNITED STATES MAGISTRATE JUD

Case 2:21-cv-01412-ART-E Document 91 File 10/18/22 Page 3 of 6

MEMORANDUM OF LAW

On September 27, 2022, Sage filed her Sanctions Motion, in which she explained that Defendants were ordered in 2017 to purge themselves of her electronically stored information in connection with abuse prevention orders she obtained against them, and to refrain from publishing any of her electronically stored information. See id. Sage learned that, in violation of the orders, Defendants retained a full backup of her iPhone, and have been mining the data on her iPhone for "evidence" that they believe aids their defense of this case (rather than relying on the normal discovery process). Id. at 6–7. Defendants also violated the abuse prevention orders by posting information from the iPhone backup, including text messages between Sage and third parties, to the public docket and sending documents to third parties. Id.

Despite the Sanctions Motion being fully briefed, and despite this Court's indication that Defendants' "use of materials previously ordered by a court in Massachusetts to be

that Defendants have created a public website dedicated to their defense. The website includes a screen shot of a police report that Sage produced in discovery in this litigation and includes a button that visitors can click to "REQUEST THE EVIDENCE," which appears to allow members of the public to receive by email "evidence" purporting to support Defendants' story. Sage has also been made aware that Defendants are promoting this website by sending emails from various anonymous email accounts to employees of the Boston Ballet. This is in addition to other emails that Sage believes Defendants previously sent to individuals in the dance industry under take email accounts, purporting to discredit Sage and linking to a Drop Box of "evidence."

Pursuant to the Local Rules of Practice, parties may file supplemental evidence in support of a motion only with "leave of court granted for good cause." L.R. 7–2(g). Here, there

Because the website essentially encourages the public to request personal information about Sage, attaching the website and the emails promoting it to this public filing may only exacerbate the harm she seeks to prevent. If the Court grants this motion to consider supplemental evidence relating to the website, Sage requests that she be permitted to file a declaration relating to the website and emails under seal.

PLAINTIFF SAGE HUMPHRIES'S MOTION TO SUPPLEMENT MOTION FOR SANCTIONS

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is good cause to consider this additional evidence in support of the Sanctions Motion. It is unclear what "evidence" Defendants intend to send to members of the public who visit their website, but based on their conduct thus far, it is reasonable to believe that Defendants intend to disseminate (and possibly have already disseminated) information from Sage's iPhone. Such would constitute an additional violation of the abuse prevention orders on a potentially massive scale.

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Defendants' sharing of personal information from Sage's cell phone with the public is plainly harassing, and has caused Sage extreme distress. And Defendants have engaged in this brazenly harassing conduct after being put on notice of Sage's Sanctions Motion, which is now fully briefed and ripe for decision. Defendants plainly do not intend to stop harass, the and the same personal data unlawfully, and this Court's intervention has become home necessary. Sage therefore respectfully requests that the Court consider this supplemental evidence in support of the Sanctions Motion, review the Sanctions Motion expeditiously, and tasks and the safe to Defendants that they may not disseminate Sage's personal to the public.

CONCLUSION

For the foregoing reasons, Plaintiff Sage Humphries respectfully requests that the Court grant her motion to consider supplemental evidence in support of her Motion for Sanctions.

Regarding Unlawfully Obtained Information.

Dated: October 18, 2022 Respectfully Submitted,

BOIES SCHILLER FLEXNER LLP

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Sage is also in the process of raising Defendants' conduct with the Massachusetts court that issued the abuse prevention orders.

PLAINTIFF SAGE HUMPHRIES'S MOTION TO SUPPLEMENT MOTION FOR SANCTIONS



Taylor Button and Dusty Button Telephone 310.499.8930 Email: worldofdusty@gmail.com

To all Counsel representing Plaintiffs,

We write this letter as a courtesy to all involved in this litigation. In light of recent discovery and many good faith efforts on Defendants' part, it is apparent that the manipulative tactics of Boies Schiller Flexner will remain consistent. Your Firm has not only been in possession of clear and convincing evidence that the narrative Sage Humphries created is false but you, yourselves have also knowingly contributed to the fraudulent narrative Sage Humphries created. After thoroughly combing through the discovery that was sent back to us last week and previously sent to you by way of our prior Counsel, it has been made abundantly clear that you not only possess the evidence that disproves Sage Humphries' claims but assist her as she continues perjuring herself, which is an obvious violation of ethics. We have proven beyond any reasonable doubt that Sage Humphries' narrative is fraudulent, including in the recent Boston hearing (which you are now indirectly filing on behalf of) for our future hearing against Sage Humphries in March.

Not only have you allowed your client to commit defamation and perjury but you have contributed to these acts of fraud, by ignoring the evidence provided as well as providing your own statements to the media even after reviewing the evidence provided, prior to those statements. Per Nev. R. Prof. Cond. 8.4 (c); You cannot engage in conduct involving dishonesty, fraud, deceit or misrepresentation. Your Firm has violated this rule numerous times throughout this litigation though Defendants, while Pro Se, have gracefully given you the benefit of the doubt. Your Firm and those representing Sage Humphries knowingly allowed her to commit multiple acts of fraud, dishonesty, and deceit. Though we are Pro Se, we will not allow your client's ability to mislead you or lead you to take advantage of our situation any longer.

As advised by The Bar Association, we are to reach out to you in an effort to "resolve" this issue before submitting a formal complaint as we know your firm has a name to uphold, a name that will certainly be tarnished by harboring fame and fortune hungry, so we are following that advice and reaching out now. You have possessed this evidence far before Sage Humphries' defamatory interviews and statements to Good Morning America, Cosmopolitan and many other publications with additional comments from your own Firms statements as well as her statements made to the Court under oath.

We understand Mr. Katz plays a large role in this charade and the evidence we previously possessed was merely the tip of a very large iceberg that the Humphries' were to keep below the surface. When Sage Humphries' claim regarding her relationship with us was disproven in our counterclaim, the admittance of her lies never took place in fact, it was Daryl Katz that became your only focal point even though you are representing women who make serious allegations that they were "raped as minors" ... allegations that fell aside after our counter claim was presented.

As a reminder, this litigation is about the claims made by Plaintiffs i.e., Sage Humphries, against Defendants only, which have all been undeniably proven false for nearly a year with a preponderance of evidence provided immediately...a preponderance that all 6 (once 7) of your clients failed then and now to produce.

Furthermore, in regards to Jane Doe 1, you now possess evidence as well as our declaration that we have never met, seen, heard of, spoken to or known of Jane Doe 1 or her existence in this world prior to the Court's disclosure of her identity. We spent an immense amount of time researching who she was once we were afforded the luxury of learning her real name and still have absolutely no idea who this woman is... our knowledge of her is that she plagiarized Sage Humphries' affidavit, lives in Boston, worked at the hair salon Sage modeled for (Salon Eva Michelle), knew the same hair stylist that styled Sage Humphries hair who also ironically did photography for the dance studio Jane Doe 1 attended and was also the first person Sage Humphries told about her relationship with us (as provided in texts via discovery from Sage). While Jane Doe 1 shared a group of friends with Sage Humphries, she certainly never shared anything with us. The most unethical fact regarding your Jane Doe 1 is that it was her claims that poured fuel on the media fire you curated – claims made by a woman we have never heard of, claims that worked suspiciously in your Firm's favor while in the presence of media.

We can only assume that you will disregard this courtesy and the evidence that substantiates it while continuing to represent Sage Humphries / Jane Doe 1 even after learning that all of her claims are false. The building Jane Doe 1 claims these heinous allegations took place in did not exist in the time she "claims" she knew us. The room that she claims she was raped in, the infamous "gun room", did not exist until 3 years later in 2017 - Even then it's existence was short lived as it was constructed in late February 2017 and dismantled in May of 2017. This room as you well know, due to your possession of receipts and records proving that all of these props were in fact plastic battery operated toys, toys that your client Sage Humphries posed with, (being the only woman aside from Defendant and Sage Humphries mother and Ms. Button's mother) that ever had access to this room, and these receipts as well as the video evidence of the creation of this room and it's décor didn't take place until late January of 2017 and therefore your Jane Doe 1 could not have accessed this room that didn't exist in the building that didn't exist in the year she claimed that it did... in fact, upon our move in to that building once it was finally completed, Jane Doe 1 didn't even live in Boston, she was at Marymount College in New York (assuming she actually attended that college, considering she has lied thus far). As we comply to your next discovery requests you will also possess

blueprints for the only homes, we built from 2014-2017, videos and photos showing their progression, video and photos that were taken weekly proving that these rooms could never have deviated from our sworn statements and that the room Jane Doe claims she was raped in COULD NOT HAVE EXISTED in the time that she claims she was raped in it. Jane Doe 1 mistakenly plagiarized an affidavit from Sage, who was the only woman present in this room 3 years later aside from Sage's mother and Dusty's mother. We can only assume you will also allow her to perjure herself OR will try to manipulate the year she previously alleged until we prove to the Court she is lying as well, which we will do regardless of your actions. She has yet to provide a piece of evidence that verifies to you she has ever met us nor will she, because she can't provide something to prove events that have never taken place...much like your other clients cannot provide evidence to prove events which they have never experienced.

Lastly, in regards to your other clients who are all ironically friends from the same dance studio. Third party texts and communications constitute nothing more than gossip and are entirely outside of the scope of what we have requested in the discovery process. While we are aware that these women could not possibly possess evidence to substantiate their false claims, we ask that the litigation process not be muddied by irrelevant presentations. Mrs. Gutierrez should certainly be able to provide communications, considering she was in a relationship with Mr. Button for nearly three years and has already committed perjury numerous times after she provided discovery which seems extremely contradicting to her own case and yet Counsel continues to support this perjury.

As you are all aware by now and as ironic as it is, Defendant Mitchell TAYLOR Button (not an alias) was abused as a child and suffered immensely, both physically and emotionally but has never once claimed to be a "victim" though he is the only real victim in this case. Now that your clients have assured the destruction of our lives, careers, friends and families we say once more that WE are the only victims present in this litigation.

Let it be known that we accept and understand the fact that you, yourselves have been misled by your clients and manipulated into supporting false narratives, but we refuse to allow that con to continue its course when there are rules in place to protect innocent people from the destruction this aggressive fraudulently unethical behavior has done to our lives.

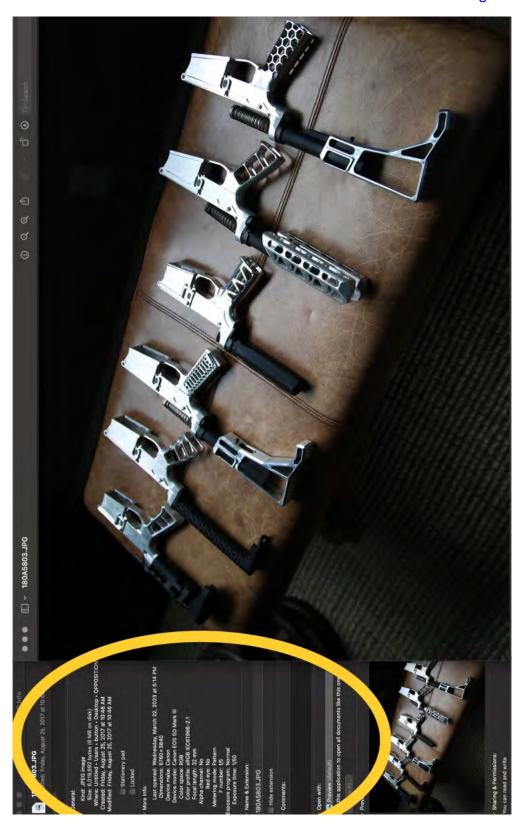
Once again, this letter is a courtesy and requirement by the Bar Association prior to taking our next step to file accordingly against the unethical behavior in this frivolous suit if these issues are not rectified.

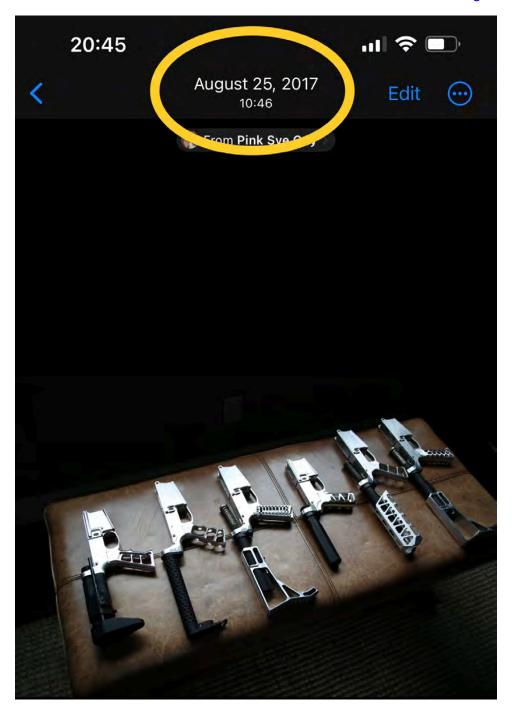
Infamously,

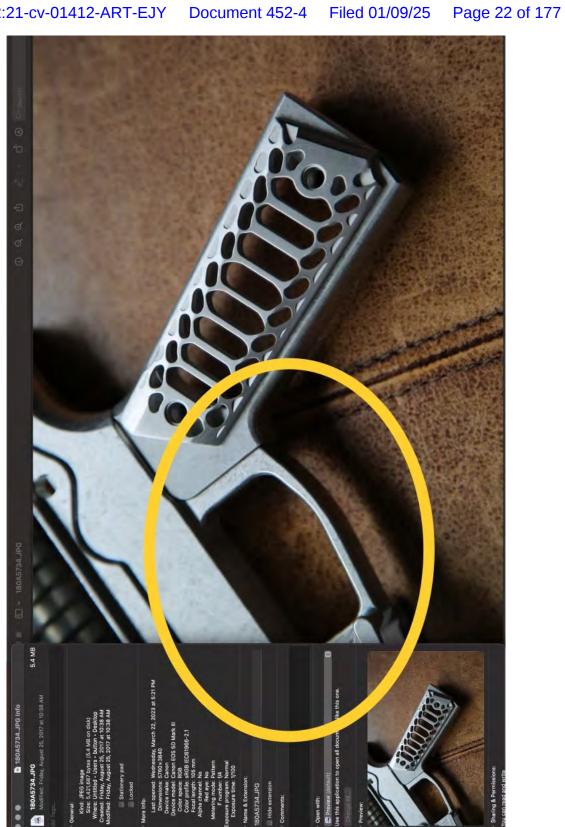
The Buttons.

Dusty Button and Mitchell Taylor Button

(Pro Se) B&B

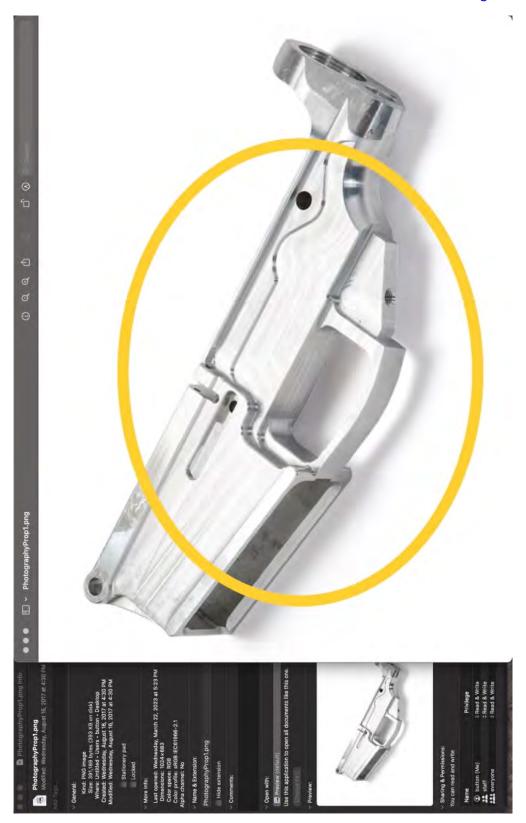


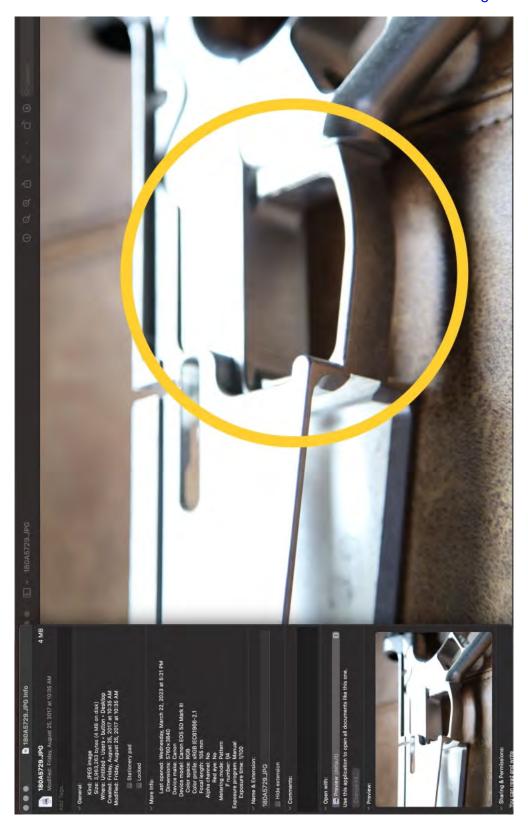










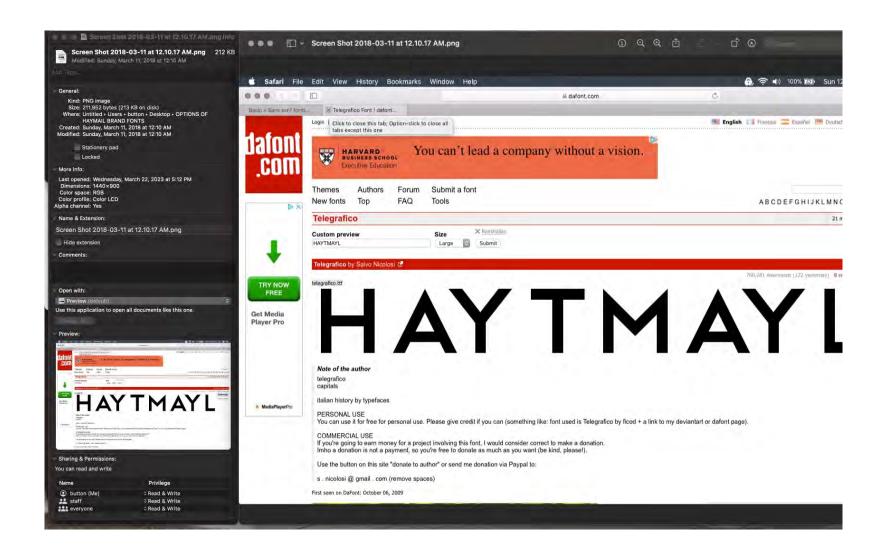


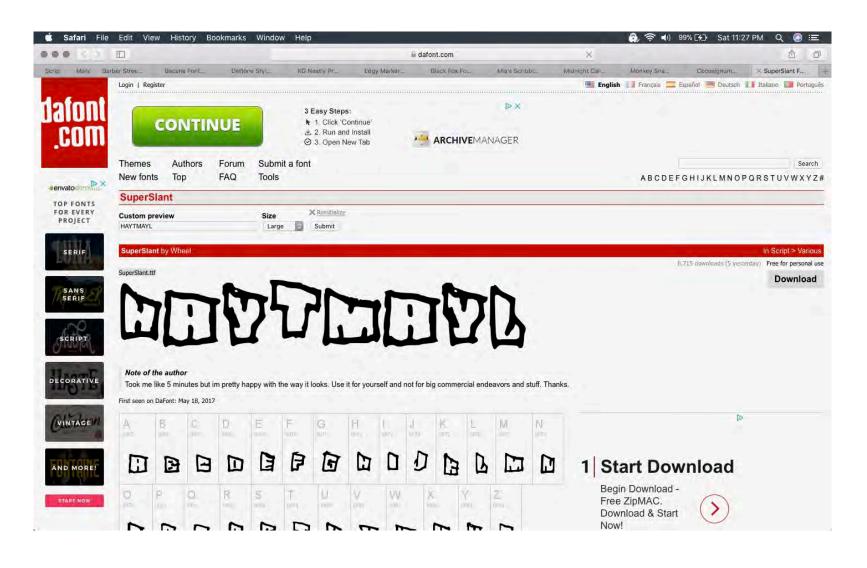


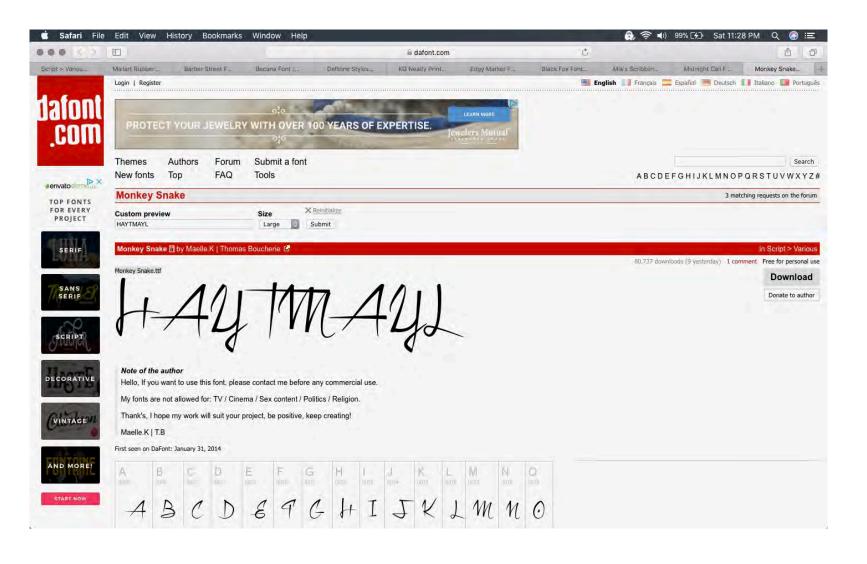




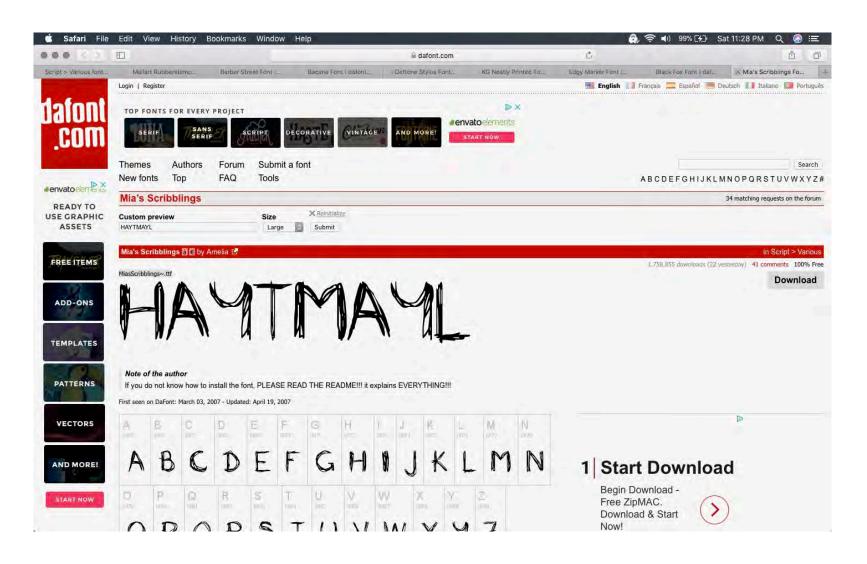




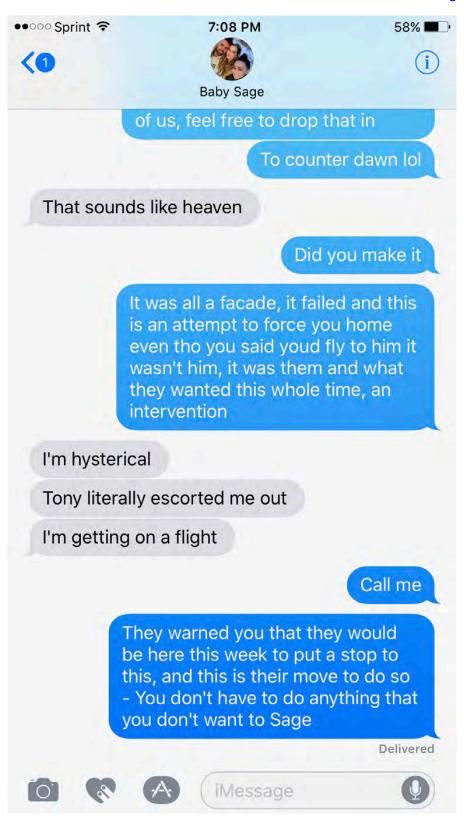








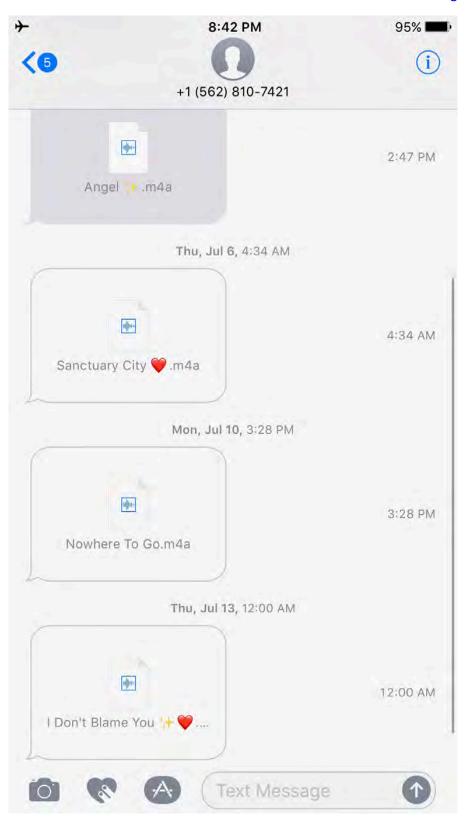
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very technologically savvy, but it's my
  1
      understanding that that hard drive contains the
  3
             MS. MELCHER: When my Brother handed it
  4
  5
      to me, he said it was partial of the information
      that I was looking for.
  6
             I believe you said that. So I just want
  8
      to make sure it's --
  9
         MR. MAHONEY: I don't -- I don't believe
      I used the word "partial."
 10
              I think that -- it's my understanding
 11
      that the information that your client is seeking
12
13
      is contained on that hard drive.
14
      That's may --
           MS. MELCHER: Okay.
15
            MR. MAHONEY: -- my understanding.
 16
             MS. MELCHER: Okay. Thank you.
 17
        THE COURT: Are you satisfied with --
 18
 19
      with that, Attorney Melcher?
             MS. MELCHER: I don't believe that there
 20
      is any way that we can really verify it.
 21
             I'd like that the order reflect that
22
      nothing be posted on-line ad infinitum related to
 23
      Ms. Humphries.
24
 25
             LMP Court Reporting - (508) 641-5801
                                                   PL-0001224
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1	VI. The Buttons Manipulated and Brutalized Sage Humphries.
2	127. Sage met Dusty in 2016 when they were both dancing for the Boston Ballet. At
3	the time, Sage was a dancer for Boston Ballet II, which is an apprenticeship program. Dusty
4	was a principal ballerina, which is the highest position for a dancer in the Boston Ballet.
5	128. Sage also met Taylor through the Boston Ballet. Taylor would regularly spend
6	time at the dance studio to watch Dusty and the other dancers rehearse.
7	129. Sage met the Buttons at a vulnerable period in her life. Sage was new to Boston
8	and did not have family or friends in the area. Unlike many other dancers in the Boston Ballet,
9	she did not come from a prominent ballet school and did not have any personal connections to
10	the professional dance community.
11	130. Around February 2017, Dusty initiated a friendship with Sage and invited her to
12	come to the Buttons' apartment after rehearsal. Sage was eager to develop a friendship with
13	Dusty given Dusty's status in the Boston Ballet and in the dance world, and especially given
14	Sage's lack of other friends in Boston.
15	131. Dusty urged Sage to develop a friendship with Taylor.
16	132. Sage soon began regularly spending time with the Buttons.
17	133. The Buttons' behavior became increasingly controlling. For instance, the
18	Buttons would insist that Sage drink heavily when she was with them.
19	134. The Buttons also began to insist that Sage sleep at their apartment on a regular
20	basis.
21	135. The Buttons instructed Sage to wear their clothes and style her hair to match
22	Dusty's hair.
23	136. Taylor told Sage that if she allowed him to control her social media, he could
24	make her famous like Dusty. Taylor insisted on having Sage's passwords, including access to
25	her text messages and emails.
26	137. Taylor helped grow Sage's social media following. Taylor told Sage that he
27	would be able to continue to help her career only if he had full control over her accounts. Taylor
28	took over Sage's posts, text messages, and emails.

16 AMENDED COMPLAINT

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One evening, Taylor placed a mattress in the living room and insisted that Sage and the Buttons all lay on it and watch a movie, with Taylor laying in the middle. At some point, Dusty pretended to fall asleep. Taylor then rolled over and began to sexually assault Sage. The Buttons threatened Sage that the only way Sage could develop her dancing, 139. singing, and acting career was if she continued to be affiliated with the Buttons. The Buttons told Sage if she did not obey the Buttons' demands, she would never succeed professionally. 140. The Buttons required that Sage regularly sleep at the Buttons' apartment, and Taylor continued to sexually assault Sage. 141. Any time Sage attempted to develop other friendships and spend time apart from the Buttons, the Buttons would become enraged. On one occasion, Sage went to lunch with a group of women. When Sage returned to the Buttons' apartment, Taylor began screaming at her. Sage feared for her safety. Taylor then forced Sage to perform oral sex on him. Sage was terrified. 142. The Buttons continued to forbid Sage from developing other friendships, and they forbid Sage from speaking with her family. 143. At one point, Sage had plans to travel to California to spend time with her family. The Buttons became extremely angry at the prospect of Sage spending time away from them. The Buttons told Sage that she must prioritize them over her family, otherwise they would ruin her dance career. The Buttons then went with Sage to California so she could not be alone with her family. 144. One day in California, the Buttons insisted that they leave Sage's parent's house to go to Sage's family beach house. Sage's parents protested because they had not seen Sage in a long time and wanted to spend time with her. The Buttons then verbally abused Sage and threatened her career success.

145. Sage took the Buttons to the beach house. There, Dusty began kissing Sage, and Taylor soon joined. They told Sage, "this is what you want, we can finally be together." Sage

17 AMENDED COMPLAINT

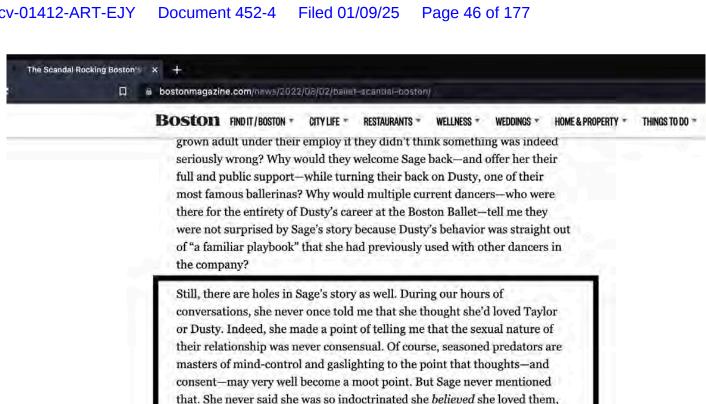
felt terrified and like the Buttons had complete control over her life.

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T	
1	146. When they returned to Boston, the abuse intensified. One evening, Sage went
2	to the Buttons' apartment after rehearsal, and the apartment was completely dark. Dusty and
3	Taylor demanded that Sage put on a spandex suit that covered her entire body, including her
4	mouth and eyes, and left only her nose and ears exposed. Dusty led Sage into a room of the
5	Buttons' apartment that had an arsenal of guns hanging on the wall.
6	147. Sage told the Buttons she was scared. They instructed her to lie down on a table,
7	and they tied up her arms and legs so she was unable to move. The Buttons then sexually
8	assaulted Sage.
9	148. Sage began sobbing and screaming, begging the Buttons to until her. The
10	Buttons told her she was being weak and stupid.
11	149. Soon thereafter, Dusty and Taylor forced Sage to have sexual intercourse with
12	Taylor. Dusty watched, and Sage cried the entire time.
13	150. After that, the Buttons began having sex with Sage whenever they pleased.
14	Sometimes Taylor would penetrate Sage while she was sleeping.
15	151. Taylor regularly shoved Sage to the ground or on the bed and violently
16	penetrated her without her consent.
17	152. On several occasions, Dusty held Sage down while Taylor penetrated her so that
18	Sage could not move.
19	153. During sex, the Buttons would choke, slap, and pull Sage's hair. Sage was often
20	left covered in bruises.
21	154. The Buttons also regularly used painful sex toys on Sage and would tie Sage up
22	in order to have sex with her.
23	155. Sage never consented to these violent sex acts.
24	156. By May 2017, the Buttons forced Sage to live with them full time, and she
25	became financially dependent on them. The Buttons did not charge Sage for rent, and they paid
26	for her meals and other personal expenses in exchange for her compliance with their abuse.
27	They continued to control her social media accounts and conversations with others.
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	18 AMENDED COMPLAINT

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1 2	157. Taylor told Dusty she was not allowed to sexually abuse Sage unless he were also present.
3	158. On one occasion, Taylor discovered Dusty sexually abused Sage without him
4	present, and he began to scream. Dusty and Taylor engaged in a physical altercation, ending
5	with Taylor striking Dusty across the face.
6	159. This experience intensified Sage's fear of the Buttons.
7	160. If Sage ever attempted to distance herself or disobey the Buttons, they would
8	threaten to revoke their financial support and sabotage her career.
9	161. The Buttons told Sage she was not allowed to speak to her parents without their
10	permission.
11	162. Sage's family became concerned with the lack of communication and thought
12	that Sage was in a dangerous situation. Sage's family flew to Boston and forced Sage to return
13	with them to California.
14	163. Once in California, the Buttons continued to contact Sage. On one occasion,
15	Taylor told Sage via Snapchat that he wanted to throw her in his van, tie her hands and feet,
16	blindfold her, rent a warehouse, hang her from the ceiling, rape Sage, "and leave [her] there to
17	die."
18	164. Taylor also threatened to break into Sage's family's home, slit her dad and ex-
19	boyfriend's throats, and beat up her mother.
20	165. At the end of July 2017, Taylor and Dusty traveled to California, causing Sage
21	extreme fear.
22	166. In August 2017, Sage sought and received abuse protection orders against both
23	Taylor and Dusty
24	167. Sage and her family expended significant costs on psychological treatment and
25	attorneys' fees.
26	168. Sage suffered and continues to suffer physical pain, mental anguish, and severe
27	emotional distress as a direct and proximate result of the Buttons' abuse.
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	19 AMENDED COMPLAINT



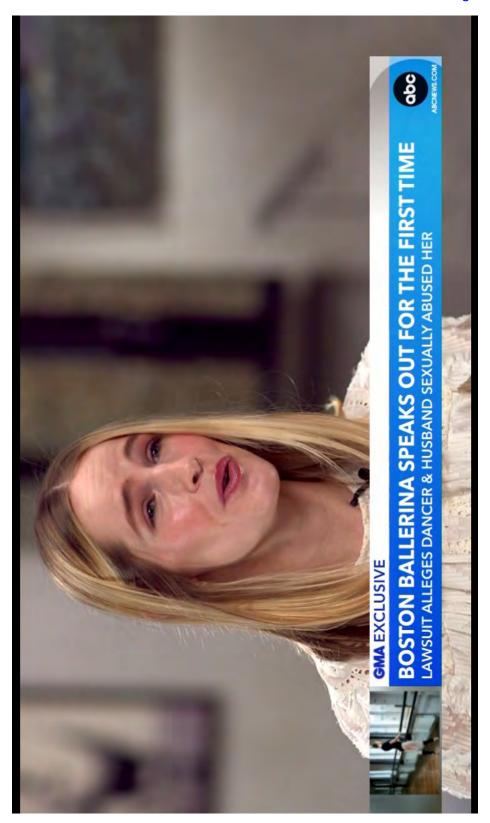
Why didn't an airport official detain, or at least question, two adults who were clearly forcing another adult-who was kicking and screaming and acting like she was on drugs-through security and onto a plane?

three of them in what can only be described as romantic bliss.

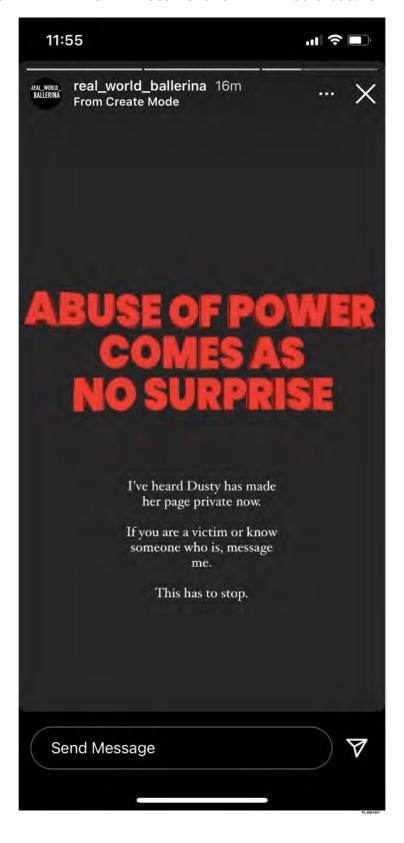
even when her behavior didn't add up, and I prodded for explanations. And yet, there were texts in which Sage spelled out her love and devotion for the Buttons, not to mention the cards, song lyrics, and all those pictures of the

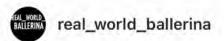
And finally, the original question that had unsettled me all along still lingered: Why did Sage go back to the Buttons' apartment the very next day -and all the following days after that-once Taylor sexually abused her for the first time not long after they'd met?

As I sat at a table buried under a mountain of black-and-white court documents, trying to wrap my head around the two competing narratives contained within them, my mind drifted back to a memory: a recent night at the ballet, when the curtain rose to a nearly sold-out audience at the goldleafed, Carrara-marbled Opera House. Sage, alongside a company of















359 likes

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TRANSCRIPT

PHONE CALL WITH JORDAN BROWN (SISTER OF KENNEDY BROWN)

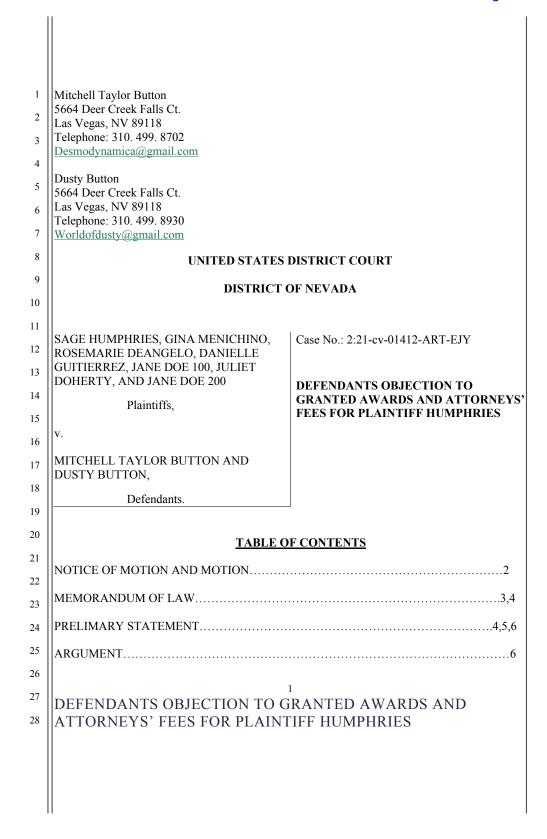
MARCH 16TH AT 7:13PM EST

- Jordan Brown: "It sounds like what she [Sage] was trying to say was that Kennedy was trying to get her information by just asking for her mailing address for like a Black Swan Hoodie, which is completely out of pocket."
- Jordan Brown: "Kennedy was saying to me... I sent it to her [Sage] and I don't know what... I thought everyone [Sage, Dusty and Mitch] was like friends? It was way before anything, Oh I know you're [Sage] friends with Mitch and I want to send you a hoodie blah blah ...and now she's [Sage] twisting it like four years later."
- Jordan Brown: "Well what does... so I guess like I'm just asking to is like you know, Kennedy is like very like, she didn't go to school, you know what I mean, and she's my little sister and she's freaking out and I feel bad for her because she's like what does this mean?"
- Jordan Brown: "Black swan is me in my bedroom, literally me out of my bedroom". "It's so not relevant, that's why we were like wait, what?!"
- Jordan Brown: "I mean that's the truth".
- Jordan Brown: "Kennedy called me and she was crying".
- Jordan Brown: "When I was reading it [the report], I was pissed. Like why would she [Sage] bring you (Kennedy) into this, what did you do to her? I said Kennedy when was the last time you talked to her [Sage]. She said, Jordan I went through every single thing in my phone and the last thing I said to her was that message (referenced in the false police report of 2018) in 2017. I didn't know about any of this (the relationship between Defendants and Plaintiff or Abuse Prevention Order).
- Jordan Brown: "Kennedy was freaking out, (saying) like I don't even know what I did. And for me too, like obviously I have Black Swan and I work for YAGP, I don't want Larissa to think this."
- Jordan Brown: "I hope you don't mind but I did... I said to Larissa that she needs to look at this and she was like Oh my God."

- Jordan Brown: "When I talked to Kennedy she was like, I went through everything. And the last message I had was like that many years ago (in 2017)."
- Jordan Brown: "Well actually, okay the only other thing she said was that she took a class with her [Sage] and she [Sage] was asking her (Kennedy) about Nashville Ballet and there was no conversation about you or Mitch." "Oh, that was a year ago, she said that's the last time she talked to her and nothing was brought up about that (the relationship between Sage, Dusty and Mitchell or Abuse Prevention Order).
- Jordan Brown: "They (Kennedy and Sage) were taking class I think, somewhere and Sage was asking her about Nashville saying, I don't know if I'm going to leave Boston, and Kennedy was like oh yea, Nashville blah blah" "No talk of Dusty or Mitch".
- Jordan Brown: "That's what Kennedy said earlier when I talked to her last time, because we have family that works with probation officers and friends that are attorneys and they told her that she should sue her [Sage] for getting you (Kennedy) involved in this".
- Jordan Brown: "I cannot believe she really used Kennedy. I was shocked! Kennedy Brown?!"
- Jordan Brown: "I will talk to Kennedy, I know she's a little freaked out but I will talk to her and we will make sure we get that and then if there is anything else you need from us like we're happy both me and her and YAGP, we're happy to help."

We, Defendants, declare under the penalty of perjury that this transcript with Jordan Brown is true and genuine. The audio file can be found filed as exhibit 10.1.

Dated this 23rd date of March, 2023



I. THE DECEMBER 1ST ORDER......6 II. PLAINTIFFS AND PLAINTIFFS' COUNSEL QUESTION DEFENDANTS' 3 5 IV. DEFENDANTS RETURNED ALL OF SAGE HUMPHIRES DATA (CAMERA 6 7 8 VI. PLAINTIFFS REQUEST AN ORDER REMINDING PLAINTIFFS OF THEIR 10 OBLIGATIONS TO UNDERSTAND THEIR LEGAL OBLIGATIONS......14 11 CONCLUSION......15 13 **NOTICE OF MOTION AND MOTION** 14 PLEASE TAKE NOTICE that upon the accompanying memorandum of law, Defendants 15 respectfully, but strongly object to the GRANTED awards and attorney's fees for Plaintiffs as these awards and attorneys' fees were GRANTED on entirely misleading and false information. 17 As previously declared under oath, it is impossible for the "text messages" (that are .PNG 18 screenshot files) from the Buttons iPhones to belong to or ever have belonged to Sage 20 Humphries. This statement is verified to be authentic and the Court will find that the "sender" of these messages is in fact Sage Humphries while the "recipient" is either Dusty or Taylor Button 22 and the third party in these messages is also "Dusty or Taylor Button", verifying beyond any 23 doubt that Sage herself could not have sent these messages to her own phone and therefore they 25 were obtained, stored and provided by and from the Button's devices. The reality that Ms. 26 27 DEFENDANTS OBJECTION TO GRANTED AWARDS AND ATTORNEYS' FEES FOR PLAINTIFF HUMPHRIES 28

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McCawley does not seems to not understand is that one cannot text themselves from their own number and add third parties in, and therefore all parties should take a moment to comprehend this impossibility. In the data which legally belongs to and was obtained from Defendant's own devices and service providers the Court will note that Mr. Button's and Mrs. Button's hands and fingers are the extremities in which showcase Sage Humphries' deceitful messages on the photo and video documentation from the Buttons iPhones. These photos and videos were recorded 8,000 miles away from Sage Humphries or any phone that she possessed after her mother allegedly threw hers out of the car window on May 25th, 2017 rendering it impossible for the Buttons to either steal, hack or possess her phone. Plaintiffs will find, if they would like to further diminish their credibility by hiring a forensic analyst, that this data was in fact created by, owned by and therefore legally obtained by the Buttons on the other side of the planet as Ms. Humphries and her parents planned their assault on the Buttons.

After May 25th, 2017 when Ms. Humphries was kidnapped and taken to California from Boston, the Buttons began recording everything Ms. Humphries and her parents sent to them. Therefore, it is IMPOSSIBLE for this data to belong to Ms. Humphries as it is NOT and was NEVER hers to begin with. Plaintiffs are merely trying to suppress the truth that negates and discredits Sage Humphries entire narrative. Defendants kindly ask the Court to review proof of Ms. McCawley's outlandish claims that Defendants violated any order and to reconsider these attorneys' awards and fees as they are based on claims that are entirely false and unproven by Plaintiffs or Plaintiffs' Counsel.

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Dated January 20th, 2023

Dusty Button and Taylor Button

(Pro Se)

MEMORANDUM OF LAW

Defendants, respectfully submit this Motion objecting the GRANTED awards and attorneys' fees to Plaintiffs, requesting a review of any proof both parties can provide 1st showing Defendants violated any order AND 2nd, providing any proof that Defendants "stole" Sage Humphries iPhone data as Defendants can prove that they did not... and that anything other than the screenshot messages between Ms. Humphries and Mr. Katz belongs and has always belonged to Defendants. To reiterate, you cannot possibly download a CSV file through a backup of a phone which would be an actual "text message" download. The text messages that Ms. McCawley continues to refer to are screenshots of text messages... Sage Humphries only ever uploaded her camera roll of screenshots, i.e. a .PNG .MOV .JPEG etc. Defendants indeed, signed declarations attesting to the fact they had a backup of Sage Humphries iPhone that she voluntarily uploaded herself. Ms. McCawley has taken it upon herself to deconstruct the verbiage in the declaration to make it seem as though Defendants have a backup of Sage Humphries entire phone which was never stated. Anyone who is technologically advanced understands that if you have an iPhone and you have a backup of an iPhone, a camera roll is part of that backup... however, CSV files (text messages) are not, therefore, making it impossible to have a backup of Ms. Humphries "entire phone". Defendants suggest Plaintiffs and Plaintiffs DEFENDANTS OBJECTION TO GRANTED AWARDS AND ATTORNEYS' FEES FOR PLAINTIFF HUMPHRIES

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Counsel educate themselves on this technology before making statements to the Court that could be misleading, creating scenarios that would cause for certain Motions to be GRANTED under false prentices and not allowing the Judge to see the full scope of information before making a decision.

PRELIMINARY STATEMENT

Defendants strongly object to the Plaintiffs GRANTED awards and attorneys' fees, as Defendants have violated no such order and did not previously violate any Court order. As explained previously, Ms. Humphries entire back up of her camera roll was sent immediately upon order, (which is the ONLY backup of any data that was discovered by Defendants during discovery). Defendants have continued to understand Rules and litigation terms during this process but were not fully understanding of what a "docket" was at the time discovery was given to their previous attorneys. IF Defendants had violated any order in any, way shape or form (which they have not) it certainly would have not been intentional as Plaintiffs' Counsel continues to suggest. Plaintiffs Motion (ECF.) suggests once again that Sage Humphries iPhone data was stolen (which it was not and can be proven with metadata), but then in a later Motion admit to Sage Humphries VOLUNTARILY uploaded her data, which is exactly what the Buttons claimed nearly two years ago. Plaintiffs and Plaintiffs' counsel continue to mislead the Court that data from Sage Humphries camera roll and/or iPhone backup has been continuously posted is entirely false and without merit and can also be proven with metadata by Defendants. The evidence that Plaintiffs continue to refer to and that they used to obtain this sanction for awards and attorneys' fees is in fact NOT Sage Humphries iPhone data and therefore misleads the Court

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27 28 that any of Sage Humphries data was used, posted or published by Defendants. This is simply not the case. The ONLY data from Sage Humphries iPhone were screenshots of text messages between Ms. Humphries and Mr. Katz. At the time those screenshots were given to Defendants previous Counsel as discovery to follow protocol as Defendants were extremely new to any of this process and were not aware of what a Public Docket was at the time of following direction and producing any and all discovery to previous Counsel. However, ANY OTHER DATA that has been inserted in any article or docket belongs to Defendants and HAS NEVER belonged to Plaintiff. Defendants kindly request that the Court not grant any further sanctions without viewing proof from both Parties as Defendants understand that EVERYONE has a right to defend themselves with evidence as Defendants can prove all of this to be true and will provide declarations under oath once again. Defendants have no intention and have never had any intention of publishing Sage Humphries data; however, Defendants have a legal right to their OWN property and data that belongs to them and has always belonged to them (and once again, can be proven by metadata).

ARGUMENT

THE DECEMBER 1ST ORDER

On December 1st the Court GRANTED Sage Humphries request that the Court use its authority to sanction Defendants for violating an APO order, the Court found Defendants willingly violated the orders by disclosing material on the docket (ID.7-9). The December 1st Order also GRANTED her request for awards and attorneys' fees and costs associated with the Motion. Further Ordered, she submitted a memorandum of fees and costs. Accordingly, Sage

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26 27 28 Humphries submitted a Motion for Approval for application of fees on December 15th, 2022. (ECF)

The Court found Defendants violated the order due to the fact the Court was manipulated into a false understanding of the APO Order which Ms. McCawley clearly still does not comprehend considering she cannot understand the folder in front of her that was sent back by Defendants following the December 1st Order. She believes she did not get the entire folder of Sage Humphries backup, yet Defendants assure the Judge and the Court (and will provide a lengthy video Defendants recorded), showcasing the "texts" Plaintiffs claim they did not receive in the folder full of Ms. Humphries data (i.e., camera roll backup). The uploading of that folder and the destruction of any copy, unplugging, packing, shipping, paying, and obtaining a receipt with tracking because Defendants knew that Plaintiffs and Plaintiffs Counsel would ONCE AGAIN manipulate the Court into a granting in their favor rather than a granting based on truth with evidence that Defendants are happy to provide again.

PLAINTIFFS AND PLAINTIFFS' COUNSEL QUESTION DEFENDANTS' RESPONSES

Plaintiffs and Plaintiffs' Counsel state "it is striking that nowhere in Defendants seven-page response did they challenge the fee." This statement, like most others made by Ms. McCawley, was published prematurely as Defendants response document (112) published to the docket thirty-two minutes after her document (ECF 111), not only challenges her fees but it challenges her ethics, her clients motivations and criminal behavior, the inability for the Boston Court to properly uphold "law and order" as well as EVERY other aspect of this lawsuit from its

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24 25 onset; as well as Ms. McCawley's inability to understand the data that has been presented to her or her requirement to the litigation process.

Plaintiffs and Plaintiffs' Counsel also state "Nor do they raise any new facts that they could have raised in their opposition to the Sanctions Motion" however.

Prior to Defendants representing themselves, Defendants' counsel refused to file various motions on their behalf due to their inability to pay for them (much like Defendants inability to pay for Sigrid's fees considering Defendants could not pay for their own) but would also not relinquish control of the docket for Defendants to file those Motions themselves. Furthermore, this delayed the process more so, which by their decision forced Defendants to miss the deadline of Opposition to the Motion to Seal, Motion to Compel and various other motions Defendants requested to file.

Plaintiffs and Plaintiffs' Counsel address Defendants response stating Defendants response is an attempt to re-litigate and issue the Court already decided they violated Boston court orders":

Defendants' previous Counsel litigated the issue of the Courts filing, therefore, Defendants themselves could not possibly re-litigate a matter they were not capable of litigating to begin with. Defendants' previous Counsel published a statement on Defendants' behalf against their wishes while simultaneously removing Mr. Katz (third-party) against their wishes, due to threats from Mr. Katz, Mr. Pellicano and Mr. Katz Counsel (Mr. Kleiger), but on Defendants' behalf. Defendants ask the Court for leniency in matters that were out of their control and against their wishes, one of which, being Defendants' previous Counsels inability to

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educate the Court on exactly what data they had... data that anyone pursuant of "law and order" for the sake of JUSTICE would understand is constitutionally wrong to strip a Defendant of... evidence that exonerates them and disproves the claims against them. This is all while simultaneously not questioning WHY Plaintiffs and their Counsel have fought for 18 months to strip them of it. If their claims in fact come with any merit whatsoever, data could not possibly exist that should concern them or their case, especially when Defendants have begged them to provide evidence of their claims rather than shying from it.

Plaintiffs' counsel also state "Defendants insist their possession of information belonging to Sage was not in violation to Boston court orders, despite this order having ruled against them."

Naturally, the Court would decide against Defendants' as what Plaintiffs and Plaintiffs' Counsel presented was false and like all other allegations fraudulent, as PROVEN BY DEFENDANTS EVIDENCE. Plaintiffs also state "on December 15th, Defendants submitted a 13 page "response" that Sage Humphries committed fraud on this Court and Boston Municipal Court". This can and will be proven on February 2nd or any other time the Court may wish to view this evidence as it has been provided by Defendants during this litigation already, none of which has yet been litigated itself. Plaintiffs also state "the only new claim we have is that we possess a backup of her camera roll". What Defendants previous Counsel stated is their choosing, however, to reiterate YET AGAIN, Defendants have only ever had the ONE backup of her camera roll, a backup we offered numerous times, a backup we LAWFULLY OWN UNDER

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LAW GOVERNING POSSESSION OF DATA. This is once again, a folder that Sage Humphries herself put on Defendants drive... a folder they have based their entire lawsuit on.

Plaintiffs' Counsel quoted "September 7, 2020" (this is an incorrect date as this litigation began in July of 2021) Defendants gave an interview in The Daily Mail – however, Defendants did not do an interview in 2020 but in August of 2022 which was then published in September of 2022. Plaintiffs' counsel continues to say Defendants think they only need to turn over that folder because they think Defendants have a copy of her entire iPhone not just a copy of her camera roll - which Defendants have already explained numerous times to Plaintiffs and Plaintiffs' Counsel will not repeat again here for the sake of time for the Court.

Plaintiffs and Plaintiffs' Counsel clearly do not understand the technology they are advocating for. This data, the data they have possession of is the ONLY DATA EVER UPLOADED FROM SAGES PHONE by Sage Humphries herself. We are happy to hold a hearing purely to prove this fact. This folder is all that existed, Plaintiffs and Counsel can trust that if there were data

Defendants hereby formally request that the Court request evidence that substantiates Ms. McCawley's claims, Plaintiffs claims, or for that matter any claims made from this point on as Defendants have thus far and will continue to provide evidence to substantiate their claims. Ms. McCawley has unethically and irresponsibly made baseless claims to the Court that Defendants have published data on a website that came from Ms. Humphries iPhone data, downloaded an entire iPhone (impossible) rather than a camera roll, "stolen" a phone that Sage claims her mother threw out of a window, disseminated information to various people - yet, they

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have not only neglected the ability to provide evidence of these claims but have out right denied the request to do so. In 18 months, it seems to still be unclear to all other Parties, aside from Defendants, but the reason for this is that evidence cannot exist for events that have never taken place. Defendants assure the Court that if it, the Court would be the first place it would present itself.

III. THE DAILY MAIL ARTICLE

The text of the Daily Mail article specifically refers to Defendants' possession of Sage Humphries text messages in addition to the pictures according to what Dusty Button states. To repeat this statement again, "Dusty says her sole focus is now poring over the thousands of texts phots and documents that she says will disprove her accusers" - This statement is accurate. Dusty, did in fact say this exact statement. What Dusty did not say however, is that "these thousands of texts and photos and documents were from Sage's iPhone data", rather, as she clearly stated for those who are not hell bent on crucifying the innocent, is that these texts were from Dusty's iPhone and Taylor's iPhone and both Defendants OWN computers. In fact, not only do Mrs. Button and Mr. Button have thousands of texts, photos and documents the to prove their innocence ALL FROM THEIR OWN DEVICES BECAUSE UNLIKE MS. HUMPHRIES THEY DO NOT DESTROY DATA, THEY IN FACT CURATE IT LIKE ANYONE WHO HAS DONE NO WRONGWOULD DO. However, from the onset of this lawsuit, Ms. Humphries and her Counsel were incorrect in stating anything was supposed to have been 'destroyed" which is why they were shocked to learn the Buttons could prove Ms. Humphries

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narrative was false and why Plaintiffs were so confident in Ms. Humphries leading the way as they all thought there would be no fight or defense for The Buttons... they were wrong.

The Buttons do not need Ms. Humphries camera roll folder to prove anything other than the fact than to prove her promiscuities and her character prior to meeting The Buttons and that her mother played a massive part in that. All other data relevant, was pulled from Defendant's devices and they invite Ms. McCawley to have a forensic analyst review the data, a review that will yield a confirmation of this statement...just like any review of any evidence will yield a review that the Buttons are the only victims here.

Plaintiffs' counsel newly states "Sage has never denied that she did not voluntarily upload the data but that does not change the fact that they violated the orders". These orders were granted on false pretenses that the Buttons illegally retained this data, this is simply untrue. There is nothing in plain text that stated the Buttons could not keep a copy of their OWN data. There is nothing in plain text that states the buttons could not share it. The Buttons did not publish it, however, their Counsel did. Sage Humphries stating that she uploaded this data, by law (reference) states that the Buttons rightfully own the rights to this data.

Again, Ms. McCawley states the material turned over by the Buttons is incomplete including because it contained no text messages and it only contained screen shots not actual texts. Defendants are repetitive at this point so please excuse having to explain this for an unnecessary number of times to Plaintiffs and Plaintiffs' Counsel.

This is because THE ENTIRE PHONE CANNOT BE AND WAS NOT BACKED UP, ONLY the camera roll, which contains images, images which are SCREEN

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SHOTS of HER TEXTS. Defendants knew that Plaintiffs and their Counsel would ONCE AGAIN try to manipulate the Court into believing their narrative so Defendants in fact recorded an unedited and unbroken 20 minute long video where they uploaded the backup of the camera roll to the drive, opened the backup showcasing ALL of Mr. Katz illicit text messages and other data on the backup, unplugged the drive and destroyed the folder from their device, packaged the drive for shipping, stood in line - mailed - paid and videoed the tracking information all without a gap in video to prove to the court that the order had been followed immediately...much like they have proven to the Court thus far.

Again, Plaintiffs' Counsel states "Nor does Defendant's response confirm they did not retain copies", it is not Defendants job to confirm these things for Plaintiffs. If they wish to do so they are welcome to issue a warrant to search and seize Defendants property, however the 20-minute video will answer any questions one may have if taken the time to watch by Plaintiffs and Plaintiffs' attorneys.

DEFENDANTS RETURNED ALL OF SAGE HUMPHIRES DATA (CAMERA ROLL)

Defendants once again returned ALL of Sage Humphries' data, nothing else exists - feel free to hire an analyst because Defendants would LOVE AN OPPORTUNITY for their evidence to actually be injected into the docket by way of forensic analysis rather than concealed, suppressed and sealed by the crooked and misguided avenues of litigation as Defendants have never had anything to hide and do not have anything to hide to present day.

V. DEFENDANTS FULLY UNDERSTAND THEIR OBLIGATIONS AS PRO SE

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Defendants fully understand every order by the Court but rather than focusing on the Defendants understanding, Defendants, however are concerned that Ms. McCawley does not fully understand her sworn ethical restraints in litigation and continues to ask that she seriously consider the violations that are warranted by trying a case in which she knows, from hard evidence, is entirely fraudulent while also understanding the professional repercussions that come from doing so.

Defendants have in fact fully complied with all Orders and all requests from Plaintiffs' Counsel, however Defendants request that the Court Order Ms. McCawley and other Counsel for Plaintiffs to refrain from any further baseless and unproven allegations to avoid wasting the courts time. Defendants are familiar with the manipulative tactics of Counsel and formally request the court require evidence from all parties proving any other claims made by Plaintiffs' Counsel, in fact, Defendants are happy to be sanctioned as such to assure "a right to a fair trial" as Defendants are eager to provide the Court with evidence that backs every claim they have made and will make moving forward. Considering a fair trial is deserved by every American citizen, Defendants ask that the litigation preceding trial be just as fair, as it has been just the opposite thus far.

PLAINTIFFS REQUEST AN ORDER REMINDING PLAINTIFFS OF THEIR VI. **OBLIGATIONS TO UNDERSTAND THEIR LEGAL OBLIGATIONS**

Plaintiffs' Counsel stated "Plaintiffs request an additional order assuring Defendants proceeding pro se understand". Defendants would like to request that the Court issue an additional order reminding Plaintiffs of their obligations and to understand their legal

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obligations and also ask the Court to intervene in the circus that Ms. McCawley has ring mastered to finally seek evidence to move forward rather than relying on disproven claims, claims in which the defendants have disproved by "abiding by their legal obligations as pro se". Plaintiffs' counsel speaks of a website; however, Defendants invite Ms. McCawley to show the Court evidence that states the buttons own and curate this website or any other online platform now that she has assured their online image is destroyed. In fact, Defendants remind the court that granting any Motion following a false claim (like all other claims they have made) is unjust and assures the Court they are happy to provide opposition with evidence at the Courts request.

Defendants remind Ms. McCawley, Plaintiffs' Counsel, the Court, and Plaintiffs that prior to Plaintiffs media campaign to destroy the Buttons, the Buttons possessed a larger following on social media than Ms. McCawley, Boies Schiller Flexner, and all seven Plaintiffs combined so with such a large fanbase plaintiffs should not be surprised that the Buttons' fans, friends and family are extremely upset with the liars and lies that have destroyed their lives over the last 18 months and are working in the Button's favor to restore their good names by showing the world the truth that the Court has not yet witnessed. In fact, the Buttons would like to remind the Court that in Ms. McCawley's statement she is stating that her client Ms. Humphries finds the public viewing of genuine data that shows her true self and her proven purpose in this lawsuit, as well as the truth... as disparaging. If indisputable evidence is disparaging to a claim, one must assume that this claim is false unless of course Ms. Humphries would like to provide evidence of her own.

VII. CONCLUSION

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In summary, the Buttons object to these unnecessary and unfounded fees as Ms. McCawley's statements are entirely unproven and considered "hearsay". There was zero data, metadata, or information to prove anything she claimed or Plaintiffs claimed regarding Defendants that would justify these awards and attorneys' fees.

Defendants request that the Court allow them the opportunity to prove this fact with evidence, evidence that has been absent from Plaintiffs side of this lawsuit but also evidence that Plaintiffs work around the clock to destroy.

Furthermore, the only forthcoming harm that could come from Defendants is in fact the truth, the whole truth and nothing but the truth. Truth that does not include data from Ms Humphries iPhone and has been proven numerous times... truth in which only harms Plaintiffs by proving to the world that they all conspired to ruin two innocent lives.

Defendants respectfully ask the Court to reconsider these awards and attorneys' fees as Defendants have violated no such Order and will continue to prove so. Defendants refuse to believe that the Court would force Defendants to pay for Ms. McCawley to continuously commit perjury and contempt... therefore, on the basis of unethical fraud and perjury, Defendants object these GRANTED awards and attorneys' fees.

Dated this 20th day of January

Respectfully,

Mitchell Taylor Button and Dusty Button

1	Dated this 20th th day of January,
2	
3	Attorney Name
4	
5	CERTIFICATE OF SERVICE
6	I HEREBY CERTIFY that on January 20th, 2023, I emailed the foregoing
7	document with the Clerk of the Court using docketreno@nvd.uscourts.gov
8	Dated this 20th day of January
9 10	Butch this 20 day of sundary
11	Mitchell Taylor Button and Dusty Button
12	Whener Taylor Batton and Busty Batton
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27	DEFENDANTS OBJECTION TO GRANTED AWARDS AND
28	ATTORNEYS' FEES FOR PLAINTIFF HUMPHRIES

The following transaction was entered on 3/17/2023 at 12:38 PM PDT and filed on 3/17/2023

Case Name: Humphries et al v. Button

Case Number: 2:21-cv-01412-ART-EJY

Filer:

Document Number: 153(No document attached)

Docket Text:

MINUTE ORDER IN CHAMBERS of the Honorable Magistrate Judge Elayna J. Youchah on 3/17/2023. By Judicial Assistant: E. Santiago.

Before the Court is Defendants' Motion Requesting Continuance of a Hearing Date. ECF No. [150]. Plaintiffs have no objection to Defendants' request (ECF No. [152]).

IT IS HEREBY ORDERED that Defendants' Motion Requesting Continuance of a Hearing Date (ECF No. [150]) is GRANTED.

IT IS FURTHER ORDERED that the Motions hearing set for March 22, 2023 at 10:00 a.m. is VACATED and rescheduled to April 5, 2023 at 10:00 a.m. in Courtroom 3A.



HOME > FILM > NEWS

Aug 25, 2022 11:05am PT

Anthony Pellicano Working for Billionaire Daryl Katz to Squash Sex Lawsuit



Los Angeles Times via Getty Imag



Marc J. Randazza, JD, MAMC, LLM Licensed in AZ, CA, FL, MA, NV

29 July 2022

<u>Via Email Only</u> <rklieger@hueston.com>

Robert N. Klieger Hueston Hennigan LLP 523 West 6th Street, Suite 400 Los Angeles, CA 90014

Re: Humphries v. Button | Daryl Katz

Dear Mr. Klieger:

I am writing in response to your letter dated July 14, 2022, the phone call we had on Sunday, July 17, 2022, and your letter dated July 24, 2022. I appreciate the time you have taken to discuss this matter.

First, I want to reiterate that we regret needing to bring Mr. Katz into this dispute, but this firm's duty to our clients requires that we pursue all options to defend our clients' interests. To that end, the Buttons' contribution claim against Mr. Katz remains both viable and necessary. In your letter, you point out that Nevada law does not recognize the sort of contribution claim that is brought in the Buttons' Third Party Complaint. We concede that this is true. However, this claim is brought under Massachusetts law, and not Nevada law.

Under Massachusetts law, there is no similar bar against a contribution claim arising from an intentional tort. See Mass. Gen. Laws ch. 231B; see also Thomas v. EDI Specialists, Inc., 437 Mass. 536, 538-39 (2002). Specifically, Massachusetts's contribution statute states:

Except as otherwise provided in this chapter, where two or more persons become jointly liable in tort for the same injury to person or property, there shall be a right of contribution among them even though judgment has not been recovered against all or any of them.

Mass. Gen. Laws ch. 231B § 1(a); see also *Thomas*, 437 Mass. at 538-39 (noting that "[t]he language of the statute does not distinguish between intentional torts and negligence" and that this statutory right of contribution "is not limited to those causes of action that existed when the statute became effective"). Additionally, the Third Party Complaint for contribution against Katz is timely:

2764 Lake Sahara Drive, Suite 109, Las Vegas, Nevada 89117 mjr@randazza.com | 702.420.2001 Humphries v. Button | Daryl Katz Page 2 of 8



Filed 01/09/25

(a) Whether or not judgment has been entered in an action against two or more tortfeasors for the same injury, contribution may be enforced by separate action. ...

(d) If there is no judgment for the injury against the tortfeasor seeking contribution, his right of contribution shall be barred unless he has either (1) discharged by payment the common liability within the statute of limitations period applicable to claimant's right of action against him and has commenced his action for contribution within one year after payment, or (2) agreed while action is pending against him to discharge the common liability and has within one year after the agreement paid the liability and commenced his action for contribution.

Mass. Gen. Laws ch. 231B § 3.

I have reviewed your research on Massachusetts law, and I respectfully disagree with your legal conclusions. Please consider:

Callahan v. A. J. Welch Equip. Corp., 36 Mass. App. Ct. 608, 609 (1994):

The worker broke his leg and brought an action against the contractor and the excavator. The contractor filed claims for indemnity against the subcontractor and the excavator, which then cross-claimed for contribution. After the worker settled his claim against the contractor and the excavator, all that remained were the indemnity and contribution claims. Based on the jury's findings that the contractor was negligent and its negligence was the proximate cause of the accident and that both the subcontractor and the excavator "caused" the accident, the trial court ruled in part that the contractor was entitled to indemnification and that the excavator was entitled to contribution from the subcontractor. The subcontractor appealed.

Also, consider Hopper Feeds, Inc. v. Cincinnati Milacron, Inc., 411 Mass. 273, 277 (1991):

Where two or more persons become jointly liable in tort, Mass. Gen. Laws ch. 231B, § 1, creates a right of contribution among them. Mass. Gen. Laws ch. 231B, § 3, sets forth two alternative methods by which a party entitled to contribution can enforce that right. First, Mass. Gen. Laws ch. 231B, § 3(a) provides: Whether or not judgment is entered in an action against two or more tortfeasors for the same injury, contribution may be enforced by separate action. Section

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3(a) creates a separate cause of action for contribution, enabling a party to seek contribution from other alleged joint tortfeasors who were not joined as defendants in the original action. Alternatively, Mass. Gen. Laws ch. 231B § 3(b) provides: Where a judgment is entered in an action against two or more tortfeasors for the same injury, contribution may be enforced in that action by judgment in favor of one against other judgment defendants by motion upon notice to all parties to the action. This section sets forth a simpler procedure by which a party can assert its contribution claims by motion against parties who were joined as defendants in the original action and against whom judgment has already been entered.

In other words, it seems that we are **compelled** to bring our cross claims now – as a jury would need to find that the two parties are jointly liable. It makes no sense to interpret this as meaning that first there must be a trial on the Buttons' liability, and then the Buttons bring a whole new claim against joint tortfeasors. In order for a party to be liable for a cross-claim for contribution, a jury must find that the two parties are jointly liable. *MacIsaac v. Magic World Balloonary Inc.*, No. WOCV2011-00848A, 2013 Mass. Super. LEXIS 1734, *15 (Dec. 2, 2013). In *Rush v. Norfolk Elec.* Co., 70 Mass. App. Ct. 373 (2007) there was a fourth party complaint by a third party defendant seeking contribution – before there was payment or adjudication.

The defendants are convinced that **perhaps** Ms. Humphries is emotionally damaged by her unconventional sexual relationships. However, to whatever extent her relationship with the Buttons caused her damage, it is inconceivable that the relationship she had with Katz (and the other cross-defendants) did not contribute to, if not entirely create, that emotional damage. Thus, they should be considered to be joint tortfeasors, and a cross claim for contribution is valid under Massachusetts law. See Sanderson v. Benedetto, No. 91-2483-D, 1993 Mass. Super. LEXIS 64, *22-23, 1993 WL 818656 (Oct. 14, 1993).

Here, Ms. Humphries and the Buttons were residents of Massachusetts both during Ms. Humphries's relationship with Mr. Katz and during the time period in which Ms. Humphries claims that the Buttons abused her. For those reasons, Massachusetts law applies to the Buttons' contribution claim.

Aside from the validity of the claim, the factual allegations likewise seem true based upon the credible testimony of my clients and the evidence that I have reviewed. By way of explanation, the Buttons possess a trove of evidence compiled from an iPhone backup that Sage Humphries left on one of their hard drives. These documents include extensive text messages between Sage Humphries and Mr. Katz, and seem to disprove Mr. Katz's contention that his

Humphries v. Button | Daryl Katz Page 4 of 8



relationship with Sage was platonic and that he was only giving Sage money to fund a film that she was producing.

First and foremost, the text messages appear to be authentic. They were taken from a backup of Sage's iPhone, and the contact for Mr. Katz displays the telephone number (780) 498-0411. It should be relatively simple for you to verify whether or not that telephone number was in fact used by Mr. Katz during that period. Additionally, the text messages we have in our possession make it clear that the other party is Daryl Katz. In various messages, Mr. Katz refers to attending "NHL meetings" and discusses the sale of his Rexall business.

Let me give u my for sure dates and maybe we can coordinate. I have NHL meetings....I'll pick u up in Boston if u like. Or send my plane back for you.

Very tense. I sold Rexall to a big US company. We are dealing with regulators which is very painful and frustrating. They have unlimited power and are not accountable to anyone. We need approval by end of this week to close the deal this year which is imperative for tax purposes. I want to come see you dance etc...

We additionally find Mr. Katz's explanation as to his relationship with Sage unavailing. First, the money was clearly not for any film, but instead intended for Sage to use on herself. When discussing the money he was sending Sage, he repeatedly told her that she should use it on herself, for "clothes, jewelry, etc." and that she should "spoil" herself with it.

I try to be but...I think u good person and u should spoil yourself a bit.

If my guys send u funds will u spend it on/keep it for yourself?

What about money? Are u ok? Would like u to buy stuff for yourself. IE clothes, jewelry, etc...or whatever you need/want.

If u send me your wire instructions I will have my guys send some cash.

Humphries v. Button | Daryl Katz Page 5 of 8



In fact, when Sage herself indicated that she wanted to use the money to further her career, Mr. Katz responded suggesting that she should use the money on herself personally, telling her again to "have some fun" and "spoil" herself with it.

Your acct is open at UBS. The guys wil put 25K in. I also told them to get you debit card and put some cash on it OR you won't buy yourself anything....which I want you to do.

Aside from the money aspect, it seems clear that Katz was not interested in a business relationship with Sage; he was interested in sex. Katz made that clear in his text messages, where he told Sage that he found her attractive and wanted physical intimacy with her. He told her that he felt that she was "dangerous" for him, that he was willing to ply her with money to get what he wanted from her, and that he wanted to take her out on his boat.

Good observation. You need to be tough...as I told you. How do I ever see you...and are u even interested? I need intimacy/passion/honesty/truth...and I demand nothing...I am honest...not jealous of anyone or anything...and searching for the meaning of life...that's it...I'd like to take you on my boat and just hang...but I don't even really know you...and vice versa.

Daryl,

I cannot begin to tell you how grateful I am. Your guidance and belief in me has meant the world.
I am going to use this gift wisely, and learn all that I can from Michael and Anthony (who are wonderful by the way). I realize that this is an incredible opportunity to build myself as a brand, and invest in my future and career. Thank you so for giving me this chance.. I can't wait to show you what I can accomplish!

Tue, Aug 30, 7:46 PM

Relax. Have some fun. Spoil yourself.

Look...obviously I find u attractive and want intimacy with you...BUT...physical and mental "intimacy"....To be perfectly honest...I can have pretty much any woman I want...yet... I find them all the same...boring. You seem different...If I didn't think so...I would not have bothered. I understand what is important to you...and I admire it...and it attracts me to you. I feel you are "dangerous" for me...which is good. I need danger. I would not go to this extent if all I wanted to do was sleep with you. For it to work... we need to have a mutual attraction and appreciate our respective wants/needs. I will never manipulate you with money. At some point it would be my preference to take money off the table all together...so you have enough so that u don't need me...and never have to worry. Then all u will need is my mind:)

Humphries v. Button | Daryl Katz Page 6 of 8



Filed 01/09/25

Additionally, if the evidence presented in these text messages is insufficient for you or Mr. Katz, I have enclosed declarations from both Dusty and Mitchell Button wherein they attest under penalty of perjury as to their knowledge of statements made by Ms. Humphries herself which support the facts alleged.

The representations you made in your letter and repeatedly in the press alleging that Sage and Katz were solely in some sort of business relationship are false. I do not necessarily attribute this to you, however; it is possible that you were simply misinformed by your client. However, should you present these false allegations in court, we will have no choice but to litigate the truth of this matter. In contrast to the evidence-free denials that you have given to the press, our clients have the proof to back up their claims.

As an additional fact, we do not agree with your assessment that Sage's date of birth is October 3, 1997. Instead, the Buttons understand that Sage was born in 1998, supporting the allegations that she was underage when she met Katz. If you have supporting documentation to dispute this assertion, we will certainly take that under advisement and will absolutely correct our pleading with respect to this fact. However, our clients had no reason to doubt Ms. Humphries when she attested to the fact that she was born in 1998. Nevertheless, this seems like an easily-provable fact, and should Sage have lied to our clients about her age, that should not be Mr. Katz' problem – and we will correct that.

I would like to address your comments to the press on this matter. We have no desire to harm Mr. Katz' reputation. In fact, to the contrary, our statements to the press have been "we are not trying this matter in the press." I also note that you have referred to this as a "shakedown" - but perhaps we assign different meanings to that word. I would perhaps agree that it is a "shakedown" if the Buttons had asked for any money from Mr. Katz – for themselves. But here, the only intent is to ensure that if Ms. Humphries is, indeed, emotionally damaged from her lifestyle choices, and that her partners in those choices are therefore liable, that the cost of the relative damage be fairly apportioned to all who participated in it.

We understand that Mr. Katz denies having a sexual relationship with Ms. Humphries. We believe that the evidence we have discovered thus far tells a different story. While we realize that Ms. Humphries may not have the most intact integrity, it is a fact that she told the Buttons that she was sleeping with Mr. Katz, and that is what the money was for. We applied some skepticism to this, until we saw the text messages. Further, we are aware that there is at least one other payfor-sex allegation in the press, and while we did not give that the same weight as actual evidence, it certainly contributed to our reasonable belief that the story is true. I will also report that I personally received a mysterious phone call from a very nervous individual who claimed to have information about "dozens" of other Humphries v. Button | Daryl Katz Page 7 of 8



women with the same story. I am obviously giving that the weight it currently deserves – as it could be someone with a vendetta against Katz, or it could even be someone with a vendetta against me, who is trying to set me up for failure. In fact, it could be an agent of Katz who is trying to set me up to be discredited. Accordingly, I will be chasing that thread further, but I am telling you this in the interest of full disclosure. Mr. Katz knows better than anyone if this call was clearly someone spreading falsehoods, or if the allegations this caller made have any weight at all.

I sincerely respect that you are a strong and unwavering advocate for your client. However, I believe that the consistent threats are not helpful. In fact, if you are going to back us into a corner, what would you have us do? Do you think that based on the facts reported to you here (and further developing as we go through the data we have) and our legal position, that this was truly beneath the requirements of Rule 11?

I further respect how you have tried to change the press narrative on this matter. Again, you have a client to defend, both in court and in the court of public opinion. However, I hope you have also seen that we have not said a single thing to smear Mr. Katz, and in looking at the texts we gave you in this letter, I hope that you see that we only filed what we felt was necessary to automatically refute a Rule 11 motion. We found no need to do a full data dump. What you should take from that is perhaps to find a desire to work a little more collaboratively with us, and not to attack us at every juncture.

Despite all of the above, we are not rejecting out of hand any resolution to this matter – and we continue to entertain your request that we drop the matter without prejudice, with a tolling agreement. We remain concerned that doing so would unreasonably prejudice our clients. But, the channels of communication are open for you to persuade us otherwise.

The thing that may close these channels of communication will be the continued threats of unreasonable claims against our clients or our firm. We brought this cross claim in good faith, to serve our clients' interests – as we are bound to do. We conducted a more-than-good-faith investigation into the facts and the law. We further required our clients to swear to all of this under penalty of perjury. We did not ask for a dime from Mr. Katz, for our clients or ourselves. We did not seek the limelight that this case attracted. In fact, we would very much like the press attention on it to go away – just as much as you do. There seems to be only one person involved in this who is enjoying the public's gaze upon the matter – and we have no control over her.

Document 452-4

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We remain open to speaking with you about this matter further and trying to find a creative solution to it. But, I do suggest that Mr. Katz re-evaluate his mistaken belief that he is involved in this for a bad-faith reason. I'm a lawyer doing my job, just like you. And I believe my clients' stories, just like you believe your client's denials. At some point, the truth (which is always somewhere in the middle) may need to be adjudicated by a trier of fact.

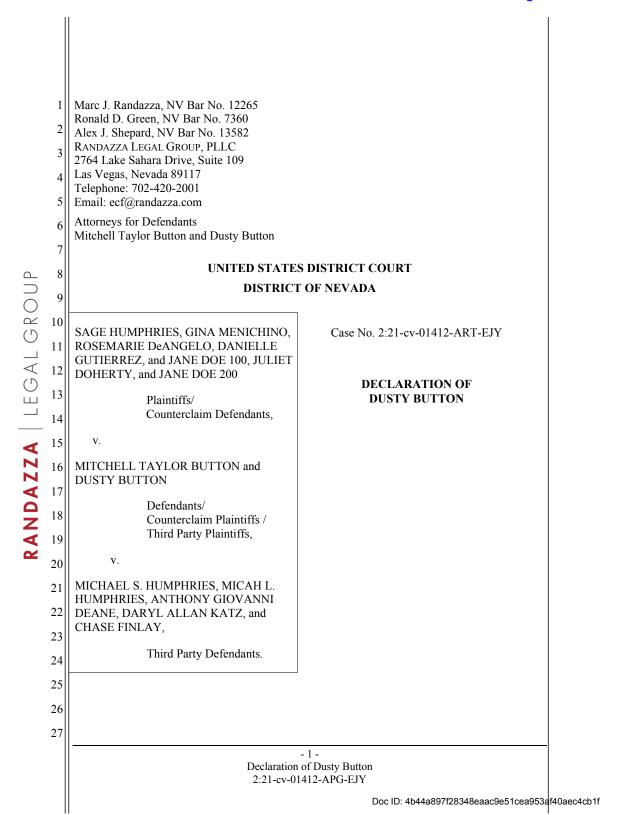
We appreciate your attention to this matter, and I look forward to another call with you, at your convenience.

Sincerely,

Marc J. Randazza

Clients (via separate email) cc:

encl: Declarations



LEGAL GROUP RANDAZZA

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DECLARATION OF DUSTY BUTTON

I, Dusty Button, declare:

- I am over 18 years of age and have never been convicted of a crime involving fraud 1. or dishonesty. I have first-hand knowledge of the facts set forth herein, and if called as a witness could and would testify competently thereto.
- 2. I am a Defendant, Counterclaim Plaintiff, and Third Party Plaintiff in the abovecaptioned proceeding.
- I make this declaration to clarify my understanding of Daryl Katz's relationship with Sage Humphries, a Plaintiff and Counterclaim Defendant in this action.
- Based on my conversations with Sage Humphries, a review of text messages between Katz and Sage, and my knowledge of public accusations against Katz by third parties, I fully believe that Katz and Sage were in a sexual relationship, and that Katz was paying Sage for sex, whether explicitly or implicitly.
 - 5. Sage told me that she had been seeing a billionaire and did not disclose his name.
- The first time Sage mentioned the "billionaire," she told me that she was seeing someone, although she was then already engaged in a separate relationship.
- Sage told me that she had met Katz at a modeling party when she was invited along with other models as entertainment, where he had taken a liking to her and informed her of his vast network of celebrity and industry friends, one of which she boasted about the most to be Leonardo DiCaprio. She also stated Katz told her that he could introduce her to Leo and that he could do a lot to benefit her career.
- I eventually came to understand that Sage was not romantically interested in this Katz, and that she was only interested in how he promised to further her career, whether that was by giving her money, introducing her to his wealthy and famous contacts, or by placing her in movies.
- 9. From what Sage had explicitly told me, I understand that Sage was frequently traveling from Boston to New York City to spend time with Katz.

Declaration of Dusty Button 2:21-cv-01412-APG-EJY

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- 10. At various times, Sage told me explicitly that she was sleeping with this un-named billionaire.
- On one occasion, Sage admitted to me that she had "fucked" a billionaire. 11. Specifically, I was playing a game of "Never Have I Ever" with Sage, and the prompt "never have I ever fucked a billionaire" arose. Sage made a show of lowering one of her fingers in response, signaling that she had indeed "fucked" a billionaire.
- During the course of their relationship, to the best of my knowledge and according to Sage's own statements, she was 17 years old. However, when Sage was asked by Katz to confirm that she was 18 years old, she said yes, and then also claimed in a separate text that she was 19.
- 13. Sage would tell me that she had to do "favors" to appease the 'billionaire' so he would continue to give her the money to produce her own movie, a movie that she said he would set up for her because he had connections.
 - 14. She referred to the money Katz gave her as "donations."
- On at least one occasion, in reference to her relationship with Katz, Sage told me: "sometimes you have to do favors to get what you want." I understood this very clearly to mean that Sage was performing sexual favors on Katz in exchange for money.
- In the course of preparing documents in this case, my husband and I discovered that we had in our possession an iPhone backup of Sage Humphries's phone that she uploaded to our personal hard drive in order to preserve the content from her phone before she returned it to her service provider upon receiving her upgrade. She was 7 days late returning her old device, causing the service provider to charge her account over \$1,000. It became urgent, then, for her to save her data and return the old phone to remedy the charge on the account.
- Upon discovering that this folder was Sage's backup on our hard drive, we then discovered text messages between Sage and Daryl Katz, wherein Katz discussed his feelings for Sage, and meeting up with Sage, and paying Sage large sums of money.

Declaration of Dusty Button 2:21-cv-01412-APG-EJY

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- Seeing these text messages as well as his contact information that she uploaded, I understood that the "billionaire" Sage had repeatedly referred to was Katz.
- After researching Katz, I discovered that an actress, Greice Santo, had publicly alleged that Katz offered her money and movie roles in exchange for companionship and sex, leading me to the concrete belief that this was a pattern that Katz was engaged in.

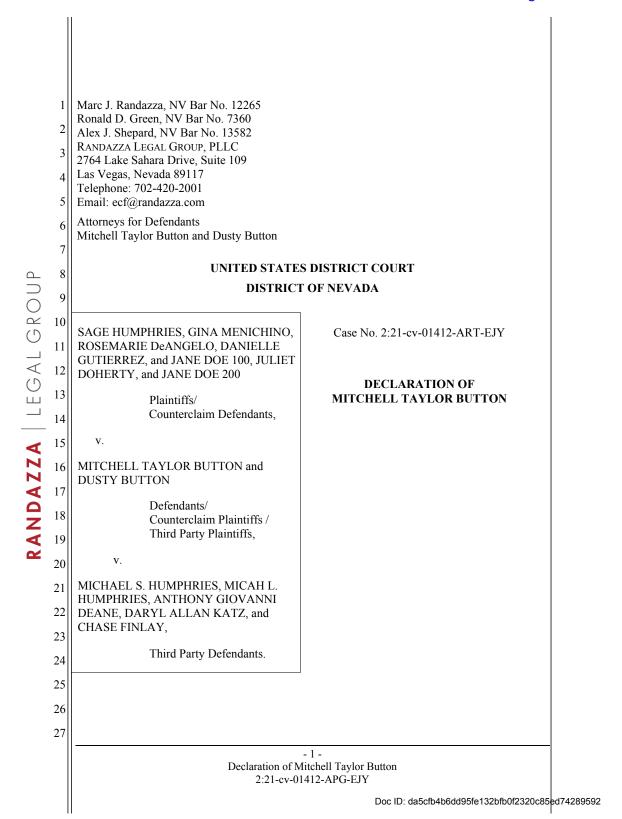
I declare under penalty of perjury that the foregoing is true and correct.

Executed on: <u>07 / 19 / 2022</u>

Dusty Button

- 4 -Declaration of Dusty Button 2:21-cv-01412-APG-EJY

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LEGAL GROUP ANDAZZA

DECLARATION OF MITCHELL TAYLOR BUTTON

- I, Mitchell Taylor Button, declare:
- I am over 18 years of age and have never been convicted of a crime involving fraud or dishonesty. I have first-hand knowledge of the facts set forth herein, and if called as a witness could and would testify competently thereto.
- 2. I am a Defendant, Counterclaim Plaintiff, and Third Party Plaintiff in the abovecaptioned proceeding.
- I make this declaration to clarify my understanding of Daryl Katz's relationship with Sage Humphries, a Plaintiff and Counterclaim Defendant in this action.
- Based on my conversations with Sage Humphries, a review of text messages between Katz and Sage, and my knowledge of public accusations against Katz by third parties, I fully believe that Katz and Sage were in a sexual relationship, and that Katz was paying Sage for sex, whether explicitly or implicitly.
 - 5. Sage told me that she had been seeing a billionaire and did not disclose his name.
- The first time Sage mentioned the "billionaire," she told me that she was seeing someone, although she was then already engaged in a separate relationship.
- Sage told me that she had met Katz at a modeling party when she was invited along with other models as entertainment, where he had taken a liking to her and informed her of his vast network of celebrity and industry friends, one of which she boasted about the most to be Leonardo DiCaprio. She also stated Katz told her that he could introduce her to Leo and that he could do a lot to benefit her career.
- I eventually came to understand that Sage was not romantically interested in this Katz, and that she was only interested in how he promised to further her career, whether that was by giving her money, introducing her to his wealthy and famous contacts, or by placing her in movies.
- 9. From what Sage had explicitly told me, I understand that Sage was frequently traveling from Boston to New York City to spend time with Katz.

Declaration of Mitchell Taylor Button 2:21-cv-01412-APG-EJY

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10.	At various times, Sage told me explicitly that she was sleeping with this un-named
billionaire	

- On one occasion, Sage admitted to me that she had "fucked" a billionaire. 11. Specifically, I was playing a game of "Never Have I Ever" with Sage, and the prompt "never have I ever fucked a billionaire" arose. Sage made a show of lowering one of her fingers in response, signaling that she had indeed "fucked" a billionaire.
- During the course of their relationship, to the best of my knowledge and according to Sage's own statements, she was 17 years old. However, when Sage was asked by Katz to confirm that she was 18 years old, she said yes, and then also claimed in a separate text that she was 19.
 - 13. She referred to the money Katz gave her as "donations."
- 14. On at least one occasion, in reference to her relationship with Katz, Sage told me: "sometimes you have to do favors to get what you want." I understood this very clearly to mean that Sage was performing sexual favors on Katz in exchange for money.
- In the course of preparing documents in this case, my wife and I discovered that we had in our possession an iPhone backup of Sage Humphries's phone that she uploaded to our personal hard drive in order to preserve the content from her phone before she returned it to her service provider upon receiving her upgrade. She was 7 days late returning her old device, causing the service provider to charge her account over \$1,000. It became urgent, then, for her to save her data and return the old phone to remedy the charge on the account.
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Declaration of Mitchell Taylor Button 2:21-cv-01412-APG-EJY

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Melrose Police Department

Page: 1

NARRATIVE FOR PATROL OFFICER JAMES T APPLEGATE

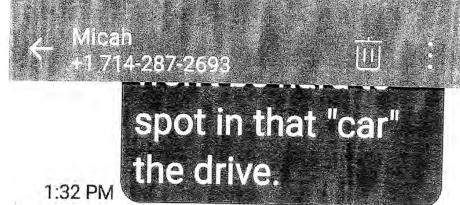
Ref: 18-9454-OF

The victim Ms. Sage Humphries, came into the Police Station this morning to make to file a report. She stated that she has a restraining order against her ex boyfriend Mitchell Taylor Moore. The docket number for this order is 791 RO 181, issued by Boston Municipal Court Department Central Division Edward W Brooke Court house 24 New Chardon Street Boston MA 02114. This order was issued on (08-01-17) modification was issued on (08-15-17) and this order expires on (08-14-18). She stated that she has a hearing on this order tomorrow morning.

She stated that in this oder Mitchell Taylor Moore was turn over all guns to Boston Police. She stated that in October after this order was issued she noticed that Mitchell posted on social media a picture of gun he was selling in California. She stated she believes that Mitchell now lives at 7950 Sunset Blvd. Los Angelas CA.

Ms. Humphries stated that she just wanted this matter on record.

A copy of this picture was attached to report





Right?

2:00 PM

Oct 30, 2017



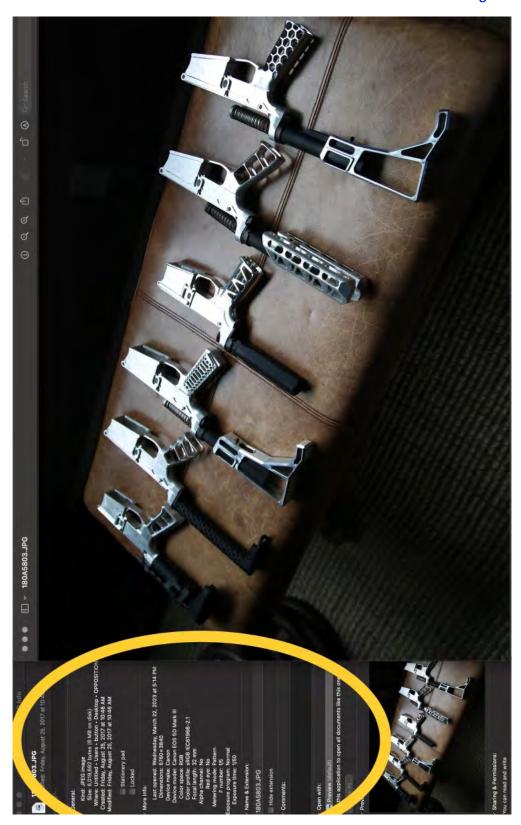
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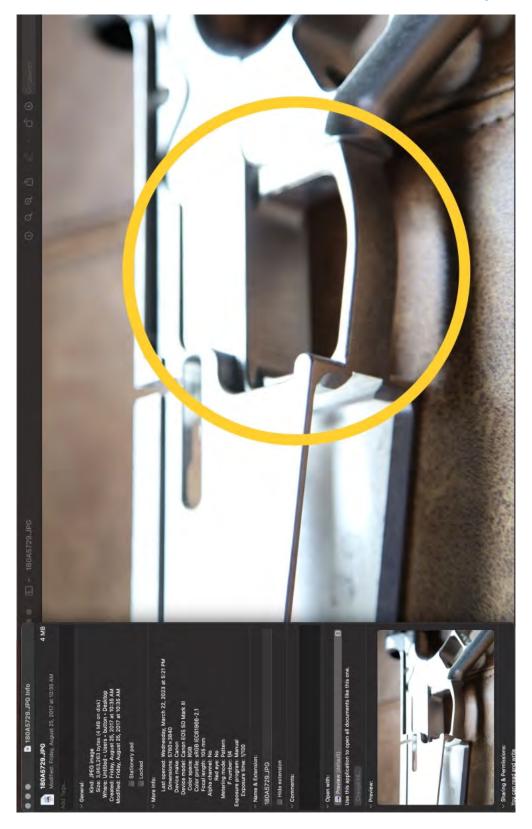
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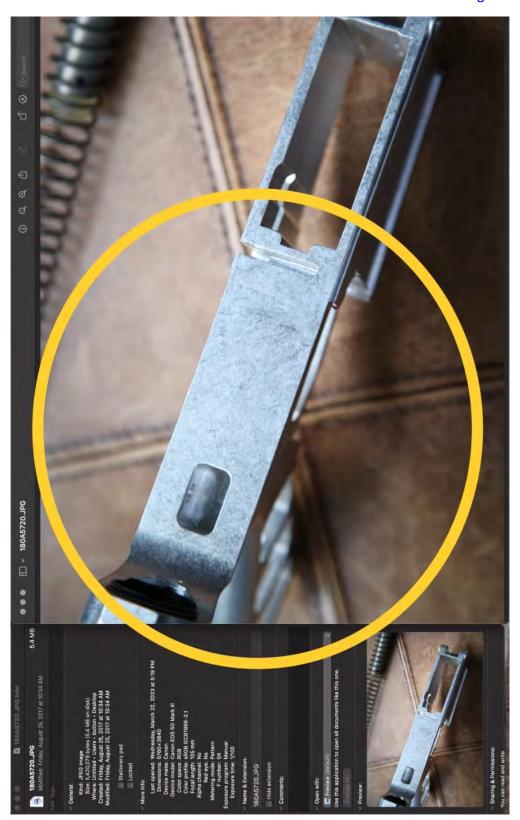
This is on Taylor's story

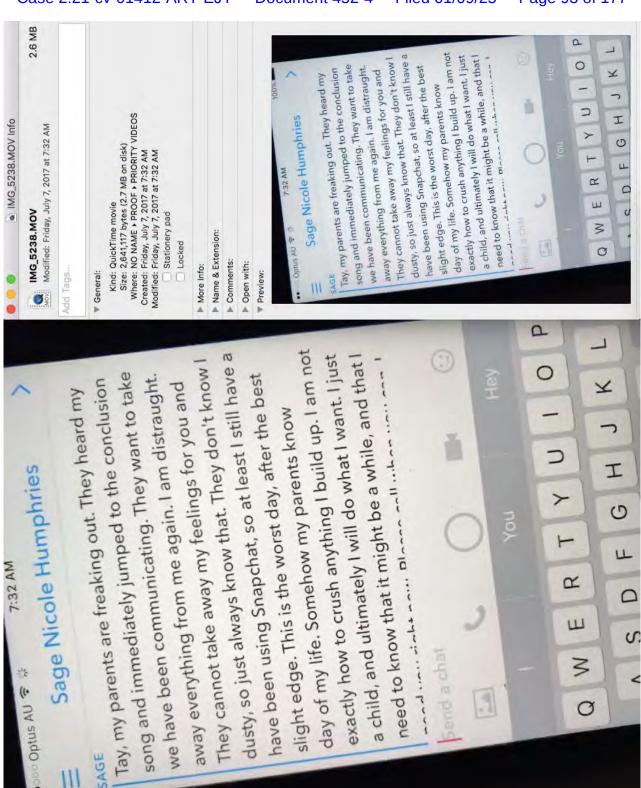
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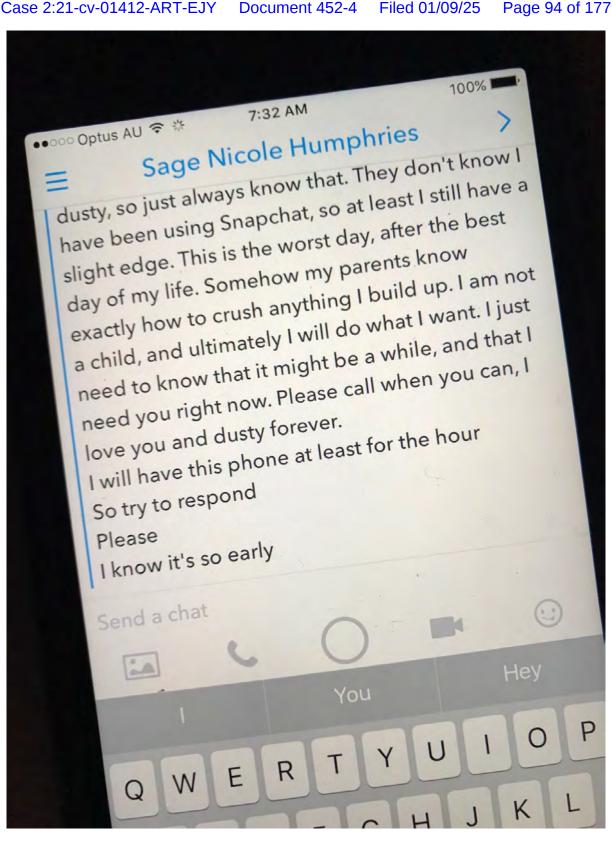
Enter message











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BY MR. MAHONEY:

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- Q. When you wrote the next line, They want to take everything away from me, what were you referring to?
- A. I was referring to my, you know, supposed relationship with them, but that was it.
- Q. And you wrote, I am distraught.

What did you mean by that?

A. I'm -- I was distraught because I was kind of in a rock and a hard place.

I didn't know how to get out of the relationship.

I also didn't know how to, you know, handle everybody talking to me about the relationship, not approving of the relationship.

 $\label{eq:controller} \mbox{It was -- I was in a distraught scenario}$ where a lot of pressure was put on me to make a decision.

- Q. Make a decision to do what, Ms. Humphries?
- 20 A. To either end the relationship or, you know,
- 21 continue with it and risk my job, family,
- 22 friends, everything that I ever knew.
- Q. So on July 7th, would it be fair to say
- 24 that you had not made a decision yet as to
- 25 whether or not you were going to end the

LMP Court Reporting - (508) 641-5801

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1 BY MR. MAHONEY:

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1-17

come to Boston and were taking you back to California, did you tell them that your parents were taking you back to California to have an exorcism?

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A. I did not tell them that I was having an exorcism.

I told them that in the airport my mom had placed hands-on me and was praying for me; and I was exaggerating, you know, what had happened.

But I certainly never said that I was going to get an exorcism.

But I may have just exaggerated that, you know, it was somewhat like an exorcism.

She just was praying for me. There's nothing wrong with that.

- Q. So you're capable of exaggeration?
- A. I would say that I am -- you know, the things that I would say in messages to them were for the purpose of appeasing them. No other purpose.

It was -- it was fear. I said things out of, you know, wanting to just make everything okay.

 $\label{eq:confrontation.} I \ \mbox{don't like confrontation.} \ \ \mbox{They know I}$ $\mbox{don't like confrontation.}$

But I certainly will stand up for myself

LMP Court Reporting - (508) 641-5801

KOLAUS R MACINTOSH

Page: 1

Melrose Folke Department

Ref: 18-6679-AR

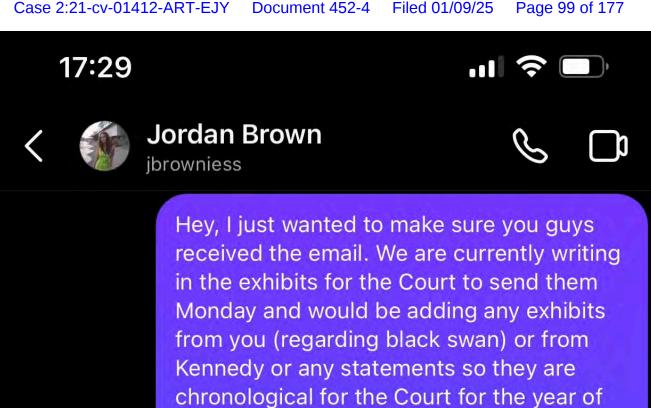
I, Officer MacIntosh, report the following summary of facts:

On June 11, 2018 at 1300 Sage Humphries came into the station accompanied by her lawyer Maura Melcher. Sage wanted to report an APO violation (1701R0181) by defendant Mitchell Taylor Moore. Sage currently works for Boston Ballet, this is where she met Mitchell. Sage told me that in November she was contacted by Kennedy Brown who is a known friend and business associate of Mitchell. Kennedy is believed to be the assistant to Mitchell's new company called Black Swan, out of LA. Sage will be providing more information such as DOB and phone number for Kennedy once she can locate it. In an Instagram message (November 2017) Kennedy asked for Sages mailing address to send her a leotard. Sage provided the Boston Ballet address of 19 Clarendon St, Boston Ma.

The following message is a copy of what Kennedy said to Sage in March 2018:

hey girl! I started this ballet streetwear line with my sister a while ago and I had actually given Mitch Button a hoodie to give to you a while back but don't know if it ever got to you, I want to send you some merch! What's your address?

Sage and Maura wanted to report the above message and see if this would be considered a violation of the APO by third party. I explained to Sage and Maura that this did not seem to meet any violation criteria. Sage explained she believes that Kennedy is aware of the APO and that this may be Mitchells works. Maura asked if we could set up a hearing instead, which I agreed to do. The next court date for Sage and Mitchell is August 15th.



2018. Thank you again and please let me

know if you have any questions about

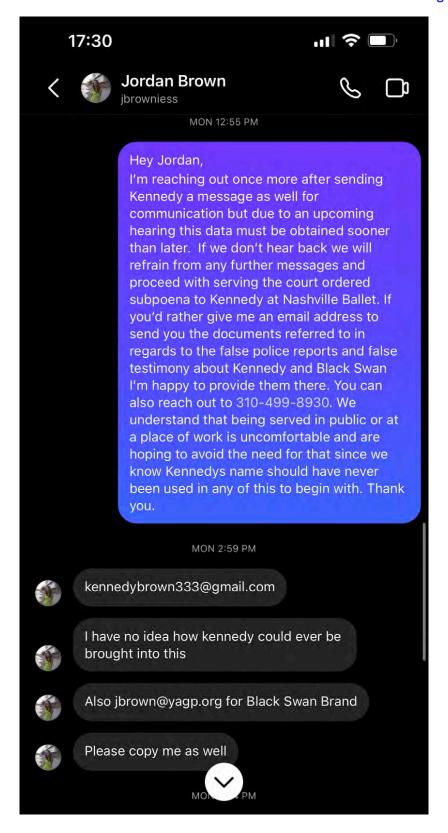
Hi Dusty, Kennedy is talking to an attorney before any response because these claims are completely out of pocket and ridiculous



Thank you for following up

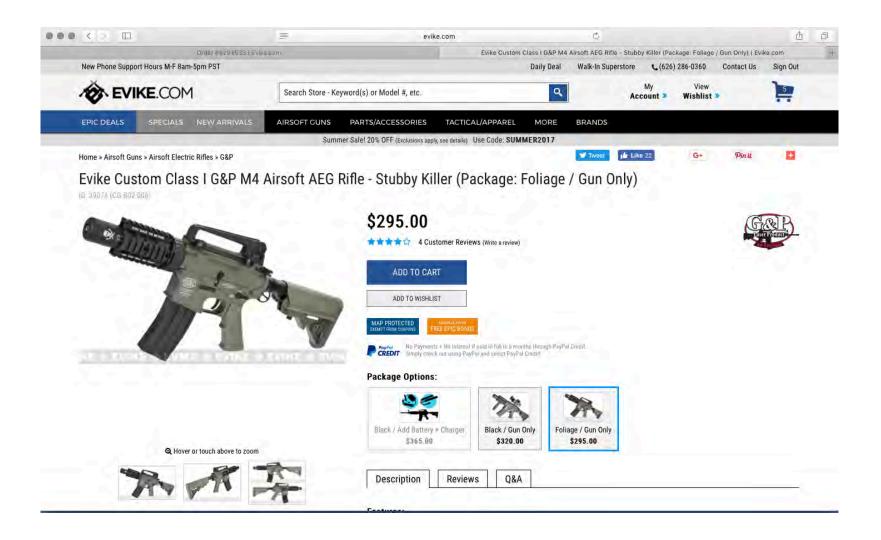
anything.

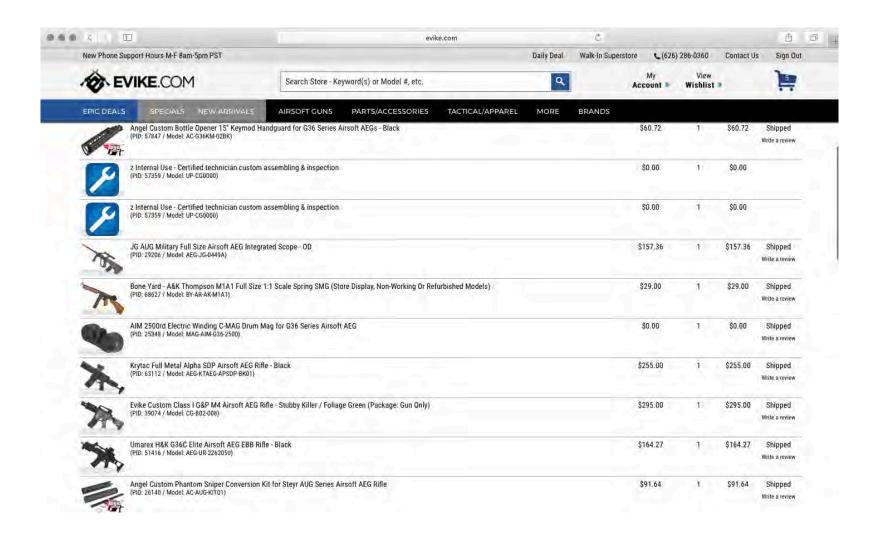
Tap and hold to react



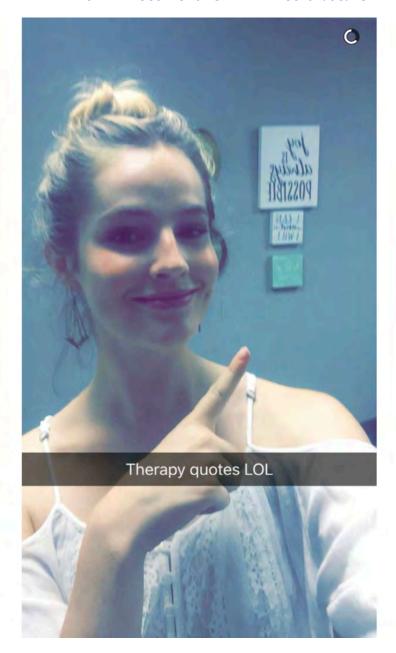


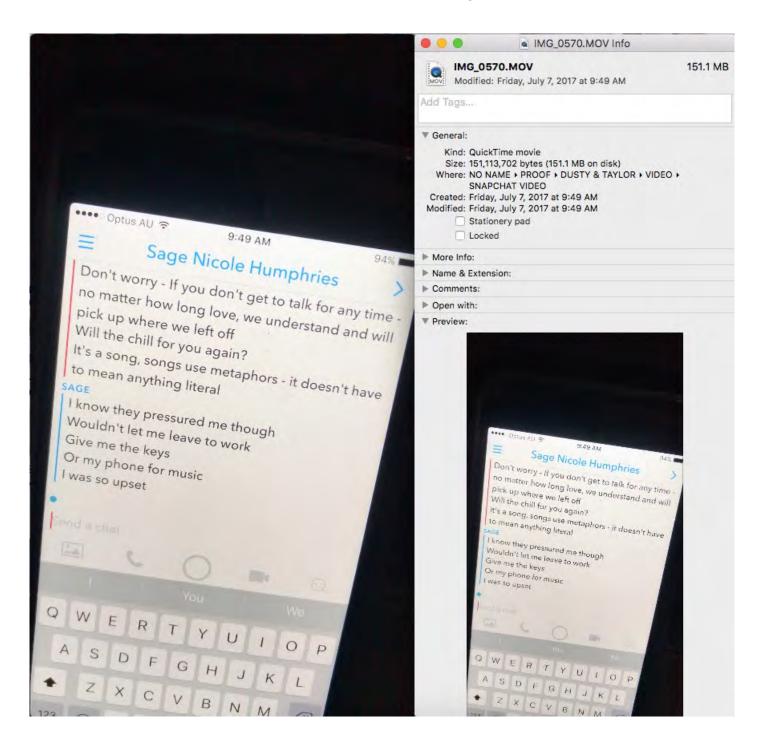




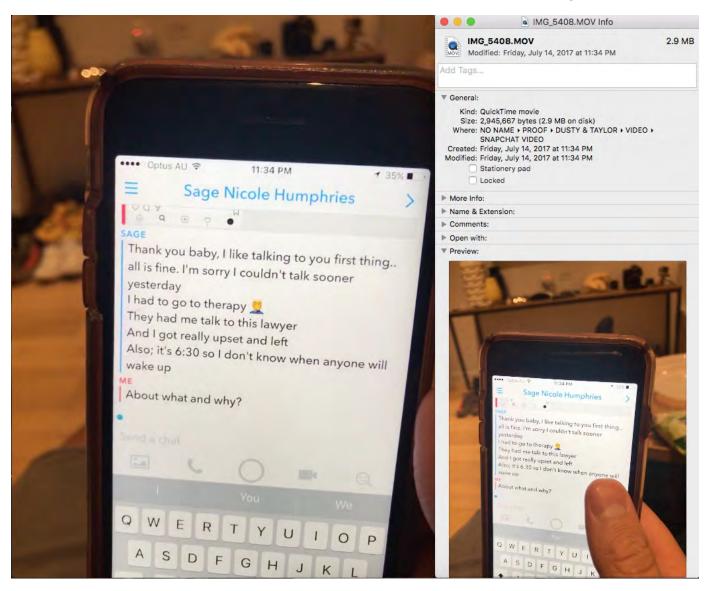


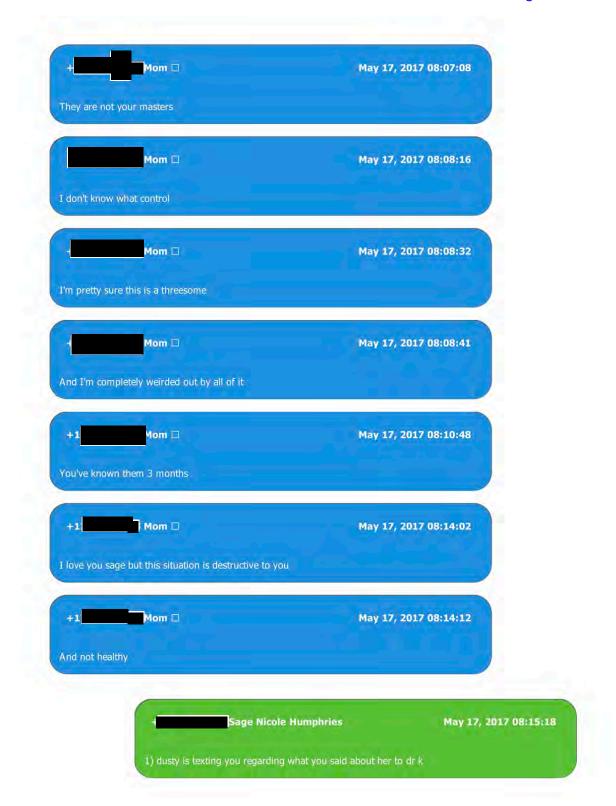






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Declaration of Laura Button in support of Mitchell Taylor Moore and Dusty Button

I, Laura Button, am over 18 years of age and have never been convicted of a crime involving fraud or dishonesty. I have first-hand knowledge of the facts set forth herein, and if called as a witness could and would testify competently thereto.

- 1. I make this declaration in 100% support of Dusty Button and Mitchell Taylor Button (previously Mitchell Taylor Moore).
- 2. I am a resident of South Carolina, mother of Dusty Button and Mother In-Law of Mitchell Taylor Button (previously Moore) Aside from his chivalrous act of taking our last name in order to allow that name to live on with no other male to do so, I consider them both to be my children.
- 3. I have been directly involved in my daughter's life in it's entirety since she survived a miraculous birth in 1989 and throughout her 33+ years, in the Defendants lives together since 2010 knowing Taylor since 2005, and was involved professionally in his life prior to 2010 when we both worked for the same company.
- 4. My husband and I both have been fortunate to travel the world with our daughter as she trained in London and performed in many countries prior to Dusty and Mitchell's marriage, with them both following their engagement and again after their move from England to Boston. I continued to visit them frequently, as frequently as once a month. Due to my frequent visits to Boston, I witnessed Sage Humphries' shocking infiltration into their marriage first hand and continued to witness their kind and gentle nature toward her prior to her parent's decision to kidnap and traffic her against her will back to California in an immoral and illegal attempt to brainwash her into living her life according to their rule. I have since witnessed the Humphries' vicious, slanderous and illegal attacks on my children.
- 5. I was present in Mitchell and Dusty's apartment at the onset of their relationship with just as I was present in their home just hours before Sage was taken by her parents where I witnessed a photoshoot Sage Humphries did. Sage was overly flirtatious, posing in some dance positions which she altered to be more sensual in nature, and she did so in all rooms of the apartment, including the room she illegally claimed to be full of "30 (and later 50) firearms, land mines and hand grenades". During the photoshoot, Sage personally and quite comfortably handled the

plastic toy guns that filled the walls of the room and unarguably had full knowledge that this photography studio was full of nothing but battery-operated toys, knowledge that did not stop her from filing a false police report, perjuring herself by filing a fraudulent affidavit or perjuring herself in court multiple times, lying to the Court in order to obtain her fraudulent Abuse Prevention Order. Not for one moment did I see one single expression of fear, anxiety, worry, stress on Sage Humphries face, the opposite was absolute. I witnessed, giggles, flirting, bending over then flipping her hair back, posing on a sofa in a sensual manner, attention seeking... quite nauseating to be honest. Those are the facts. She was not afraid.

- 6. I offer this testimony to verify beyond any reasonable double that the claims Sage Humphries made against my family are entirely false and I witnessed that not only did she not fear my children but that she initiated the relationship with them and aggressively pursued it, to what extent is unknown, as she did so up until the point that she was taken by her family.
- 7. I communicated personally with Sage Humphries' father via text message in regards to the \$750 we spent to return all of Sage's belonging to her parents' house in California. This communication circumvented her own as she was not allowed to use a phone during her time being wrongfully imprisoned, forced into therapy and brainwashed into believing that she had been a victim to anyone other than her family.
- 8. I personally bought some of the plastic airsoft props for Mitchell's birthday that Sage Humphries falsely claimed to the Court to be firearms and was present during the time of the construction of the photography studio in 2017. Not only was I present during this time, but Sage Humphries own mother took photos of this room, herself, when she stayed at their apartment and since it was her phone number that called in the false police report resulting in their apartment being raided, it goes without saying that this report was knowingly fraudulent and therefore criminal. Nevertheless, the injustice that came from this fraudulently obtained 209A has forever changed the course of my children's lives, lives that were dedicated to inspiring and helping others prior to the Humphries' mission to destroy those lives.
- 9. The Humphries have committed multiple crimes to assure the destruction of my children's lives and their careers EARNED careers, careers built with determination, commitment, ethics, sacrifice, using their God given talents which they each developed over many, many-years of hard work, yet the Humphries have suffered no consequence to their illegal actions while my family has suffered countless civil rights violations based on this order, which is founded on lies formulated and spread as a collaborative effort by the Humphries.

- 10. In 2017, we were certain that this order would be dismissed due to the overwhelming abundance of evidence that we all possessed against the Humphries however, it became clear that the Court had made a decision prior to hearing the case and therefore that evidence was never considered nor was the lack of Sage Humphries "preponderance" of evidence.
- 11. In 2018, Mitchell did not own firearms in the state of California nor did he ever attempt then or in Boston to sell any firearms that he did not possess.
- 12. In 2018, Dusty and Mitchell did not have a secret company, nor did they send a secret employee to find Sage Humphries.
- 13. In 2017 and 2018, Sage Humphries withheld multiple fraudulent Police incident reports from the Court due to the fact that ALL of them ended with officers investigating her claims only to sign off that "there was no risk of imminent danger nor fear of imminent danger, there were no firearms being sold, there was no violation to a restraining order and that her relationship with my children was consensual and she was capable of leaving at any time". She withheld these documents because if she hadn't, the Judge could not have granted her restraining order as all of these reports prove that the requirements for a 209A were never met.
- 14. While the Abuse Protection Order that was wrongfully granted against Dusty and Mitchell was surely an injustice, it was Micah and Michael Humphries who truly deserve that Abuse Prevention Order against them as it is considered "abuse" in all 50 states to wrongfully imprison an adult, aside from the crimes that come along with human trafficking and kidnapping.
- 15. While I wish that Sage Humphries had never infiltrated my daughter's marriage, and 100% believe this was a calculated maneuver by Sage, I would never intervene as the Humphries did because as an adult, Sage Humphries was entitled to make her own decisions, and live her life accordingly.
- 16. It is my perception that Sage Humphries intent was to infiltrate Mitchell and Dusty's marriage, get Dusty fired from Boston Ballet and replace Dusty to be with Mitchell. Sage Humphries' actions while in my presence, were not shy in the least bit. On the contrary, her behavior was flirtatious and somewhat seductive as demonstrated by her glances, body language and her aggressive pursuit of a relationship with my daughter and son in-law was impossible to overlook.

- 17. Dusty and Mitchell never showed any aggression toward Sage Humphries nor did she ever show any signs of fear of them. They always displayed kind treatment toward Sage Humphries and her family but claims of threats and danger were fabricated solely for the purpose of fulfilling the requirements of a 209A, requirements that were not met in 2017 nor were they met in 2018.
- 18. Mitchell and Dusty were rooted in Los Angeles for years prior to their relationship with Sage Humphries. They frequently travelled to Los Angeles to stay with many of their friends, drive their many cars stored around California all prior to moving to Los Angeles in 2017.
- 19. Dusty and Taylor clearly just want Sage Humphries and anyone or anything related to her to vacate their lives forever but to date, it seems that Sage Humphries has no plans to stay away from their lives. In regards to trauma, Dusty and Mitchell, myself and the rest of our family, certainly suffered a lot at the hands of Sage Humphries and she continues to traumatize them today. She is jealous of the career and status she will never have and her uncontrollable jealousy led to the actions she took to destroy Dusty and Taylor's careers.
- 20. On May 13th, Dusty, Sage and myself went shopping in Boston for Mother's Day weekend and went to lunch before Dusty's performance at the Boston Opera House that evening.
- 21. I watched Dusty perform at the Boston Opera House with Sage Humphries in the audience on the evening of May 13th. Dusty was injured during the performance and immediately, Sage who was seated next to me, quickly knocked against my legs as she brushed past me and hopped over the edge of my seat to run backstage saying she had to check on Dusty. As a mother, I of course was very concerned and wanted to check on my own daughter as quickly as I could. My perception of Sage's reaction was that it was quite unusual how frantic she was reacting and how quickly she ran backstage with complete disregard to walking with me, or asking if I too, was going backstage. Once backstage, Sage was overly concerned, frantic, asking Dusty many questions about how she felt, was she okay, is there anything Sage could do for Dusty.
- 22. On May 13th, I took an Uber with Dusty and Sage after Dusty's performance back to Dusty and Mitchell's apartment. Mitchell was out of town on a business trip in Arizona and I was staying at their apartment for Mother's Day weekend as once again, I frequently visited. We ordered pizza and watched to that night while Dusty recovered from her injury while Sage made many attempts to try and comfort Dusty once back at the apartment.

23. I have seen all the evidence against Sage Humphries and her family that my children have had since 2017 and continue to procure.

STATEMENT

As a mother, it is absolutely disgusting and outrageous that Sage Humphries has been fixated on destroying lives that at one point in time cared for her own. What she has done to my children was calculated and it seems she has no conscience, feels no remorse, nothing at all for the chaos and absolute destruction she has created. The moment I saw the way Sage Humphries acted toward my daughter's husband, I knew she did not care for my daughter, she wanted everything my daughter had, Dusty's inner beauty, grace, earned success as a world renown Principal Ballerina - one of the youngest to achieve this in the world - which brings with it a position in a company, accomplishments that took 25 years of hard work to establish and develop, and was only using Dusty to acquire status, fame and notoriety in the dance industry and a second goal of having her husband as well. In essence, Sage Humphries wanted to be Dusty.

The fact is that this is not the first time Sage Humphries has "played this role" as she did so with another couple, breaking up their engagement. This behavior and manipulation is a pattern for her. Watching Sage Humphries infiltrate my daughter's marriage was something I never thought I would experience in the span of my lifetime, and Sage Humphries' manipulative tactics are far beyond what I thought someone would be capable of. In my humble opinion, her behavior and mindset stems from deep rooted jealousy, an ego that leads her to believe her actions are justified as they get her closer to her goal, her desperate desire for fame and fortune regardless of the destruction she creates, and a perverse mindset of manipulation and deceit - but it is most disheartening to see that Sage Humphries and her family have not seen any - not one single consequence to their actions. To intentionally create a "story", a lie with the intent of taking away what another person has spent their life time achieving is a travesty.

Sage Humphries has created a false narrative that has not only continued to this day but has embellished and changed over time, this narrative began as one she created ONLY to regain her freedom from her Parents' captivity as an adult and be afforded the right to return to the life she had been living prior to their intervention.

Sage Humphries was forced to sign the restraining order in 2017 but after earning her freedom by destroying my children's lives, she had the opportunity to rectify her civil rights violations but instead, she doubled down and committed her crimes of perjury by the numerous filings of fraudulent Police reports again to obtain a permanent order in the absence of the Dusty and Mitchell's ability to defend themselves, a defense which seemed to be irrelevant to the Court in 2017, though that defense proved through a preponderance of evidence that her claims constituted fraud on the court.

This restraining order has never been about protection, which is ironic considering it is an "Abuse Prevention Order", it has been about the suppression of truth and data, data the incriminates Sage and one of the most powerful and wealthy men in the country for their criminal acts of prostitution and tax evasion when she was 18 years old. The suppression of this data is what led to the destruction of my children's lives and furthermore, to the hiring of a hitman to break into their home years down the road. If anyone is deserving of an Abuse Prevention Order, it is my children, as the only abuse that has been witnessed here is the abuse of the judicial system, abuse of power and manipulation, abuse of Sage Humphries by her parents, and Sage's abuse of defamation while hiding behind this fraudulently obtained restraining order and destroying my children's lives.

The claims Sage Humphries made leading to the granting of her restraining order are verifiably false through the evidence that Dusty and Mitchell have provided however, if it were not, I declare for the record that this restraining order was not necessary and that the requirements for an Abuse Prevention Order were not met in 2017, nor were they met in 2018 but unfortunately the evidence they possessed to not suffer the injustice that took place in 2017 and 2018 through this fraud on the court was never accepted or considered...until now.

Sage Humphries and her parents have succeeded for years at manipulating the justice system, her legal counsel, her employers, the media and everyone else that she comes into close proximity with. Sage Humphries is a vicious actress with no ability to feel empathy for the lives she destroys on her illegal adventures to fortune and fame.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 19th, 2023

Laura Button

Declaration of Rich Costa in support of Mitchell Taylor Moore and Dusty Button

I, Rich Costa, am over 18 years of age and have never been convicted of a crime involving fraud or dishonesty. I have first-hand knowledge of the facts set forth herein, and if called as a witness I could and would testify competently thereto.

- 1. I make this declaration in support of the Defendants Mitchell Taylor Button (previously Mitchell Taylor Moore) and Dusty Button.
- 2. I am a resident of Massachusetts and long-time friend of Mitchell and Dusty Button. I actively participated in their lives beginning in 2015 and continue to do so today.
- 3. I am close friend of the Defendants.
- 4. I witnessed the loving relationship that they shared with Sage Humphries first hand.
- 5. I offer this testimony as a witness to Defendants relationship with Sage Humphries and my personal knowledge that Sage Humphries never acted fearful of Defendants at any time when I witnessed their relationship.
- 6. It is my belief (due to my personal knowledge of Defendants consensual relationship with Ms. Humphries and witnessing their relationship) that beyond any reasonable doubt, the claims Sage Humphries made against the Defendants are entirely false.
- 7. I witnessed Sage Humphries' actions while she was around Defendants and declare that Sage Humphries never acted as though she was in any imminent fear or danger.
- 8. I personally fabricated the steel "BUTTON" sign showcased in the Button's airsoft (plastic toy gun) photography studio and was present during the construction of this room in February of 2017. I can therefore verify that the claims Sage Humphries made in 2017 regarding the Buttons possessing over 50 firearms, land mines and hand grenades is entirely false.
- 9. I was present in the Button's home with Sage Humphries and I can confirm that Sage Humphries was fully aware that this room was full of plastic battery-operated toys prior to filing out her 2017 affidavit.
- 10. I personally witnessed the relationship between Sage Humphries and the Defendants, both first hand and online and I fully declare that to my knowledge, their relationship was nothing but consensual, healthy and happy until her parents intervened on May 25th, 2017.
- 11. On May 25th, 2017 Micah and Michael Humphries took their daughter against her will and trafficked her back to their home in California. On May 27th, 2017, just two days later, the Defendants received a call from an unknown number while sitting with me in

my car. The Defendants answered this call on speaker phone enabling me to witness the entirety of the call. Dusty said hello and Sage responded, crying and clearly under duress. She called out to Dusty from the other end of the phone sounding desperate, "Dusty...Dusty! Omg, Dusty I love you please help me! They took my keys, my license, my phone, they shut my bank account down and forced me into therapy they are having my priest pick me up every day and making me have exorcisms. I had to borrow this phone from a stranger in a Mexican restaurant and I'm in the bathroom but I memorized your phone number before they took my phone, is Taylor (Mr. Moore) there?" Dusty said yes, he's here, to which Sage said "OMG Tay, Taylor I love you please wait for me...I am so sorry". Mitchell and Dusty both told Sage that everything will be okay and asked her if she was okay, to which she asked them once more to "send help", she inferred that she had been imprisoned. Ms. Humphries proceeded to tell the Defendants that she had to go but she will try to get access to another phone again as soon as possible. She asked them to keep their volume up and to "wait for her". The call ended with Sage once more telling the Defendants that she loved them, to which the Defendants returned the sentiment. It was clear from what I heard on the call that Ms. Humphries was being wrongfully imprisoned by her family and being held against her will without access to the public, her cell phone, her bank account or any other form of communication that should not have been stripped from her.

- 12. I declare that from my first-hand knowledge of Defendant's relationship with Sage Humphries and witnessing it myself, that she has painted a picture that was not of the reality that she shared with them, a picture that seems is what her family brainwashed her to believe.
- 13. The relationship I witnessed and the communication from Sage Humphries to Defendants over the phone that I heard directly contradict claims made by Sage Humphries in 2017 and the years following.
- 14. I was aware that the Defendants had an abundance of evidence against Ms. Humphries in 2017 but it was not heard or seen in Court.
- 15. I witnessed Sage Humphries physical actions toward Defendants and not once did Ms. Humphries ever seem distraught, forced, under duress, fearful, nervous, or any other emotion other than happy she was with them.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 19th, 2023

Richard Costa

Rich Costa

Declaration of Eric Cheney in support of Mitchell Taylor Moore and Dusty Button

- I, Eric Cheney, am over 18 years of age and have never been convicted of a crime involving fraud or dishonesty. I have first-hand knowledge of the facts set forth herein, and if called as a witness I could and would testify competently thereto.
 - I make this declaration in support of Defendants Mitchell Taylor Button (previously known as Mitchell Taylor Moore) and Dusty Button.
 - 2. During the years of 2017 and 2018 I was a resident of California and long-time friend and business associate of Defendants.
 - 3. I actively participated in the Defendant's lives beginning in 2014 and continue to do so today.
 - 4. I am an active participant and close friend of the Defendants and I witnessed the loving relationship that they shared with Sage Humphries first-hand.
 - 5. I was the first person told of their consensual relationship in person, as Ms. Humphries and Defendants told me in April of 2017, in the days following the first sexual encounter that Ms. Humphries initiated with the Defendants over Defendant Mitchell Moore's birthday weekend, while they were visiting Sage Humphries' parents.
 - I first met Sage Humphries when she asked Defendants if she could visit my shop with them so that she could see the Defendant's Ferraris that were at my shop. The Defendants have stored their Ferraris in Los Angeles since 2014.
 - 7. It is my belief (due to my personal knowledge of Defendants consensual relationship with Ms. Humphries and witnessing their relationship) that beyond any reasonable doubt, the claims Sage Humphries made against the Defendants are false and without merit.
 - 8. I witnessed Sage Humphries' presence in Defendants lives via Snapchat, Facetime, text messages and Instagram stories / direct messages with the Defendants during the entirety of their relationship, as well as her presence as Defendant Moore constructed his photography studio with nothing but plastic battery-operated toy guns. Like everyone else who witnessed the construction of this room in February of 2017, Ms. Humphries was fully aware that the Defendants did not own any firearms, hand grenades or land mines.
 - 9. I declare that during the months of April and May I viewed numerous Instagram stories on both Defendants' and Ms. Humphries' Instagram accounts indicating a consensual relationship from videos they *all* shared and posted publicly, together.
 - 10. I witnessed Sage Humphries sexual and physical actions toward Defendants during their visit to my shop as well as her intentions; as they were apparent upon her first visit to my shop to view Defendant's Ferrari collection. Ms. Humphries seemed to be in awe of the

- cars and the lifestyle that came along with them. While Ms. Humphries has manipulated the Court into believing she was a victim, it was my perception (having witnessed the "throuple" in person) that Sage was the aggressor of the relationship and had the inability to keep her hands to herself even when in the presence of mixed company.
- 11. Ms. Humphries was not under any influence at the hands of the Defendants during any time I witnessed their relationship.
- 12. For as long as I have known Defendants they do not, nor have they ever cared for drug use and to my personal knowledge from a decade of friendship, they did not intervene in Sage Humphries' heavy use of Marijuana.
- 13. I witnessed Sage Humphries holding a bong to Defendant's mouths and lighting it in a desire for them to smoke it. This was in a Snapchat video during their relationship.
- 14. I witnessed Sage Humphries and Defendants playing Mario Kart in their photography studio "airsoft gun room" during their relationship. This was through a Facetime video call.
- 15. Having witnessed the relationship between Sage Humphries and the Defendants both first hand and online I can verify that everything I witnessed was healthy and happy until her parents intervened on May 25th, 2017.
- 16. On May 25th, 2017 the Defendants called me, extremely distraught and told me that Ms. Humphries had been kidnapped by her family and that she was taken back to California against her will.
- 17. On May 28th, three days after Ms. Humphries was kidnapped by her parents, the Defendants called me again, distraught and worried for Ms. Humphries. They informed me that they got a room at the Intercontinental Hotel in Boston's Seaport to decompress and assess what best to do as they did not want to be at their apartment due to the reminder of Ms. Humphries and the shocking scenario that had taken place. They also informed me on the phone that they had reached out to a friend with ties to law enforcement in California to seek advice on the matter, worrying that Ms. Humphries needed help.
- 18. The following day on May 29th Defendants called me again to tell me that while they were at the hotel, their home was raided by Police following a fraudulent 911 call that was made from Sage Humphries' mother's cell phone. They also informed me that the Police told Defendants that Micah Humphries (mother) told the Police that the Defendants had over 30 automatic machine guns, land mines and hand grenades in their apartment but that the Police signed off on this call as false and verified that the claims were untrue.

- 19. The Defendants informed me during the months of May, June and July that Sage Humphries was using her younger brother's phone to reach out to them on Snapchat and that her parents did not know.
- 20. The Defendants informed me that they were not reaching out to Ms. Humphries first but were responding to her messages.
- 21. The Defendants informed me that Ms. Humphries was continuously asking for help and to come save her.
- 22. The Defendants informed me that Ms. Humphries was being forced against her will to file restraining orders against them in order for her parents to let her go back to Boston to work at Boston Ballet.
- 23. The Defendants did not ever advertise or attempt to sell firearms in the state of California nor did they own any firearms in the state of California.
- 24. As I witnessed much of their relationship whether it be online, through messaging or in person, Defendants never showed any aggression toward Sage Humphries nor did she ever show any signs of fear of them. The Defendants always displayed kind treatment to Sage Humphries and her family.
- 25. Following the Defendant's move to Los Angeles in November of 2017, I immediately began spending my days with them while fabricating their two-world famous Ferrari builds which Sage Humphries referenced in the love song she wrote for Mitchell following her kidnapping, a song titled "Mr. Ferrari".
- 26. The Defendants never spoke of Sage Humphries to me again after August of 2017 until they informed me that they received notification that the Abuse Prevention Order had been made permanent following a hearing they had no knowledge of in 2018.
- 27. From what I witnessed myself, throughout the Defendants relationship with Sage Humphries, it seems she has very clearly created a narrative that is not at all what I witnessed or anyone who was around the three of them during their relationship witnessed. Ms. Humphries never showed fear, stress, unhappiness, duress, or any other emotion that would be considered a sign of being distraught. Everything I witnessed was loving and happy, though Ms. Humphries could not keep her hands to herself. If anything, her actions displayed that she wanted more from Defendants.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 19th, 2023

Declaration of Taylor Mosher in support of Mitchell Taylor Moore and Dusty Button

I, Taylor Mosher, am over 18 years of age and have never been convicted of a crime involving fraud or dishonesty. I have first-hand knowledge of the facts set forth herein, and if called as a witness could and would testify competently thereto.

- 1. I make this declaration in support of the Defendants Mitchell Taylor Button (previously known as Mitchell Taylor Moore) and Dusty Button.
- 2. I am a resident of Los Angeles, California.
- 3. I am the best friend, and former neighbor, of the Defendants during their time they lived in Los Angeles, CA.
- 4. I began participating in the Defendant's lives in 2014 and continue to do so today.
- 5. I lived in the same building as the Defendants from 2017-2021 in Los Angeles, CA, where the three of us often spent the majority of our spare time together. As an a close friend of the Defendants, I was fully aware of the relationship that they shared with Sage Humphries. In fact, I was the first person that the Defendants told about this relationship outside of immediate family.
- 6. I offer this testimony as a witness to Defendants relationship with Sage Humphries and my understanding that Sage Humphries never acted fearful of Defendants at any time during their relationship or after.
- 7. On May 25th, 2017 the Defendants called me, extremely distraught and told me that Ms. Humphries had been kidnapped by her family and that she was taken back to California against her will. Over the next few days, the Defendants, seemed extremely upset and worried for Ms. Humphries wellbeing. On my call with Mitchell Moore, (a call that can be found via the Defendants submissions to this hearing), Mitchell stated that Sage Humphries asked them to send help, and that she had been taken against her will. Mitchell asked for my advice in regards to involving the Police to "rescue" Sage Humphries from this apparent kidnapping. Ultimately the Defendants chose to not involve the Police due to the fear that it may make things worse for Sage rather than helping her.
- 8. The Defendants informed me their home was raided by Police following a fraudulent police report made from Sage Humphries' mother's cell phone. The Defendants also informed me that she told the Police that the Defendants had over 30 automatic machine guns, land mines, and hand grenades in their home but the Police signed off on this call as false and verified that the claims were untrue, yet Sage

- Humphries continued to add 20 firearms to that claim when she filed her temporary restraining order against them in August.
- 9. Furthermore, I was made aware of Sage Humphries' online presence with the Defendants during their relationship, including the time period when Mitchell constructed his photography studio with plastic, airsoft toy guns. Sage was also fully aware of this and that the Buttons did not own any firearms, hand grenades, or land mines.
- 10. I believe Ms. Humphries' involvement with the Defendants was consensual, healthy and happy prior to her forced removal from their lives.
- 11. As far as I know, the Defendants owned no firearms in Boston nor did they own land mines or hand grenades.
- 12. As far as I know, the Defendants did not ever advertise or attempt to sell firearms in the state of California, nor did they own any firearms in the state of California.
- 13. I am aware of the plastic airsoft guns that were present in the Defendant's photography studio. I witnessed Mitchell's trade of these plastic toys in their entirety for a Suzuki dirt bike that he parked next to my car in the parking garage of our homes at 7950 W Sunset Blvd. Los Angeles, CA 90046.
- 14. I do not believe the Defendants ever had a secret company, nor did they send any employee of that non-existent company to find Sage Humphries.
- 15. To my knowledge, the Defendants did not show any aggression toward Sage Humphries nor did she show any signs of fear of them.
- 16. Following the Defendants' move to Los Angeles I immediately began spending all of my spare time with them and in that time, we did not speak of Sage Humphries, until they received notification that the order had been made permanent following a hearing, they had no knowledge of in 2018.
- 17. I personally talked the Defendants into moving into the building I live in at 7950 W Sunset Blvd. The Defendants informed me of Sage Humphries 2018 affidavit claims, that they moved to Los Angeles to "keep tabs on her", but I personally helped them find an apartment in my building so that we could spend more time together, defeating Sage Humphries' claims that they chose this location due to its close proximity to people she knew.

- 19. The Defendants informed me that Sage Humphries was using her younger brother's phone to reach out to them on Snapchat and that her parents did not know.
- 20. The Defendants informed me that they did not reach out to Ms. Humphries after she was kidnapped in May but were responding to her messages on Snapchat and messages she sent from her parents' phones.
- 21. The Defendants informed me that Ms. Humphries was continuously asking for help and to come save her after she was kidnapped.
- 22. As I witnessed much of their relationship, whether it be online or through messages, Defendants never showed any aggression toward Sage Humphries nor did she ever show any signs of fear of them. From everything that I witnessed, the Defendants always displayed kind treatment to Sage Humphries and her family.
- 23. Defendants showed me much of the evidence against Ms. Humphries in 2017 in regards to their relationship prior to their first hearing in August of 2017, but informed me after the hearing that none of the evidence was looked at which I found to be extremely unusual.
- 24. From what I understood of the situation, throughout the Defendants relationship with Sage Humphries, it seems she has created a narrative that does not reflect what I witnessed.
- 25. I saw numerous stories on both Defendants' and Ms. Humphries' Instagram accounts indicating a consensual relationship.
- 26. After years of friendship with Defendants and witnessing their character, I believe the defendants are NOT capable of any of the claims Sage Humphries has brought forth against them.

I declare under penalty of perjury that the foregoing is true and correct

Executed on March 19th, 2023

1 come to Boston and were taking you back to 2 California, did you tell them that your parents 3 were taking you back to California to have an 4 exorcism? 5 A. I did not tell them that I was having an 6 exorcism. 7 I told them that in the airport my mom had 8 placed hands-on me and was praying for me; and I 9 was exaggerating, you know, what had happened. 10 But I certainly never said that I was 11 going to get an exorcism. 12 But I may have just exaggerated that, you 13 know, it was somewhat like an exorcism. 14 She just was praying for me. There's 15 nothing wrong with that. 16 Q. So you're capable of exaggeration? 17 A. I would say that I am -- you know, the things 18 that I would say in messages to them were for the 19 purpose of appeasing them. No other purpose. 20 It was -- it was fear. I said things out 21 of, you know, wanting to just make everything 22 okay. 23 I don't like confrontation. They know I

don't like confrontation.

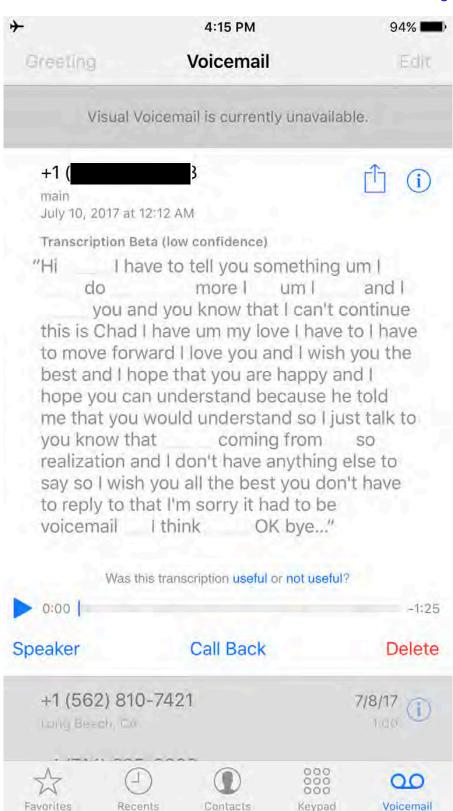
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But I certainly will stand up for myself

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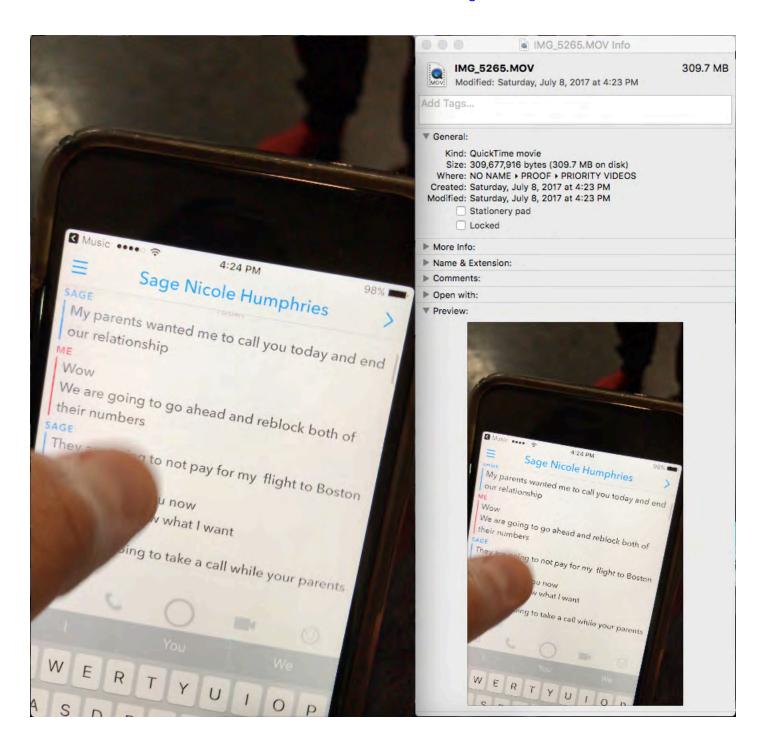
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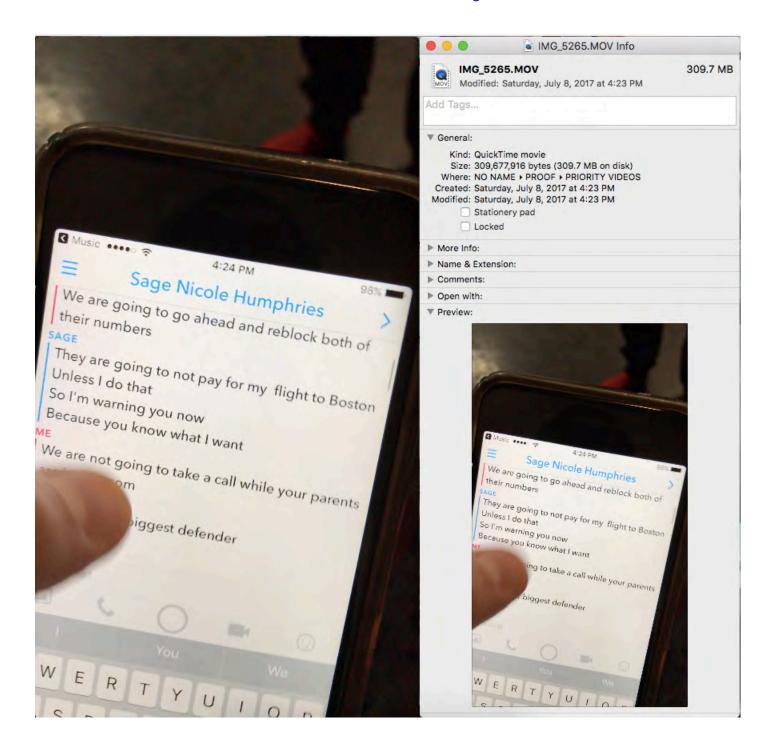


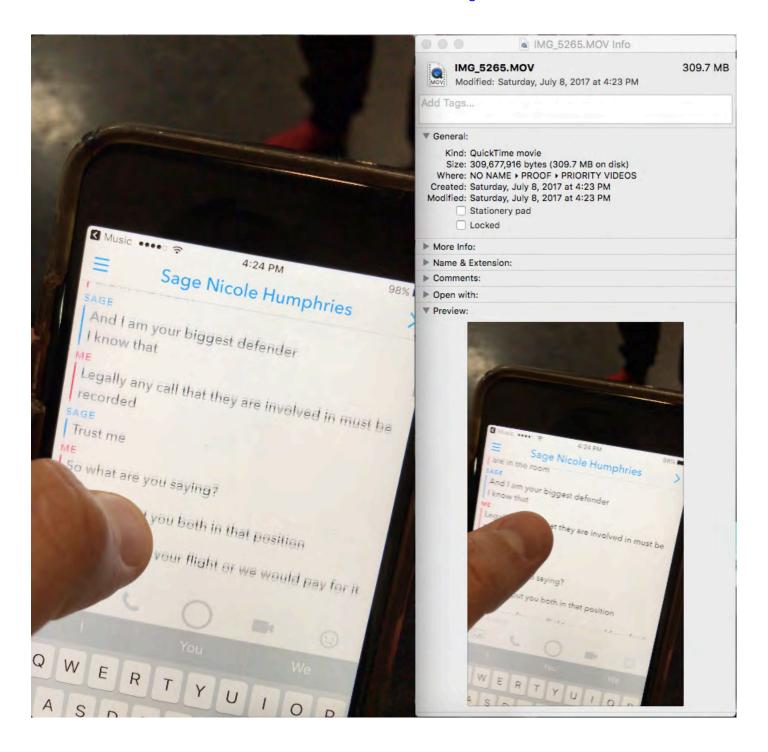
1-25 105h? 1 2 A. Yes, I was. 3 They had sent messages in the previous 4 days that were quite terrifying. 5 And when all of that was going through my 6 mind when I had the decision whether or not to leave the voicemail, I ultimately decided that I 7 8 wanted to take the first step in regaining my 9 freedom back. 10 And that was the first step. 11 Q. Isn't it true that you had sent them a 12 message through Snapchat informing them that on 1.3 July 10th you would leave them a fake voicemail 14 breaking up with them in order to satisfy your 15 parents? 16 A. I said it would be fake. 17 O So you said -- you Indicated to the Buttons 18 that this message that you would be sending or 19 leaving on -- on July 10th would, in fact, be a 20 fake message? 21 A. Even if it was to be a fake message, they 22 didn't want me to send it, regardless. 23 Q. Okay. But you warned them ahead of time 24 you'd be leaving a fake message; is that correct? 25 A. I did.

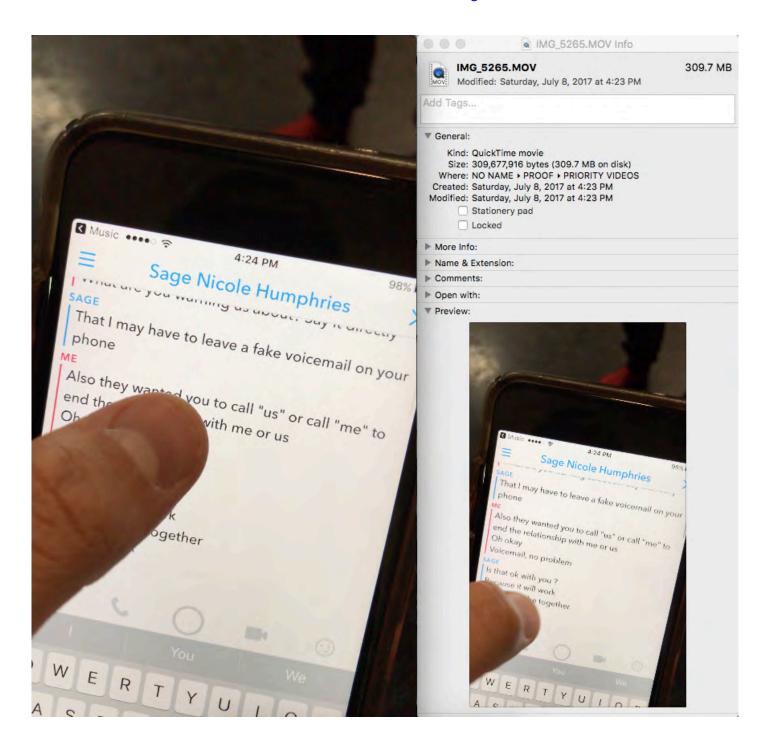
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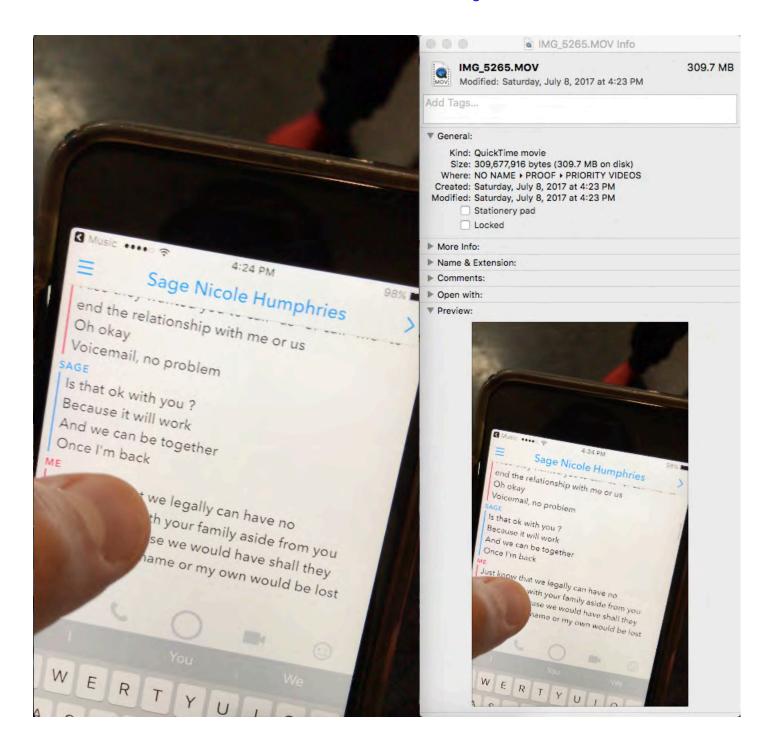
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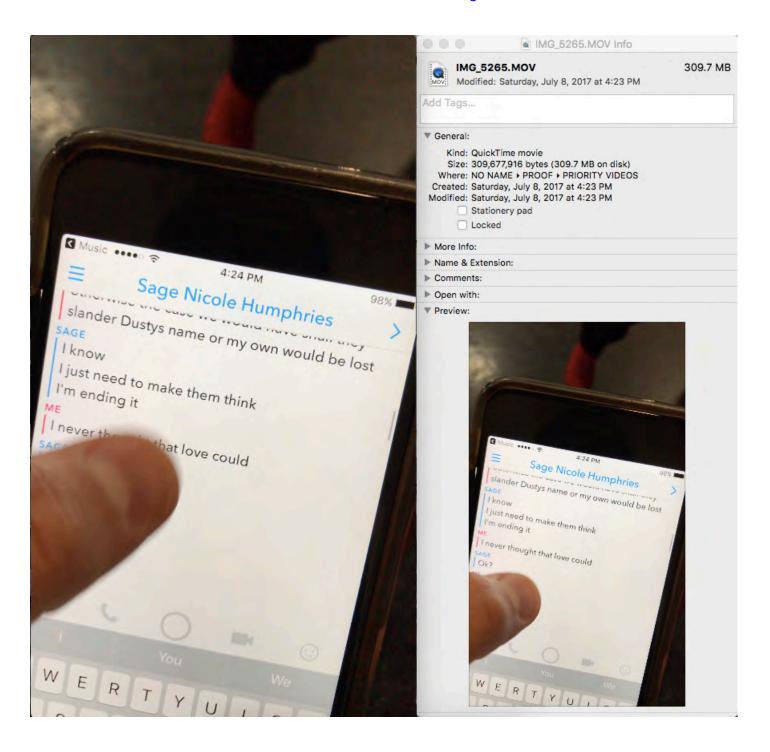


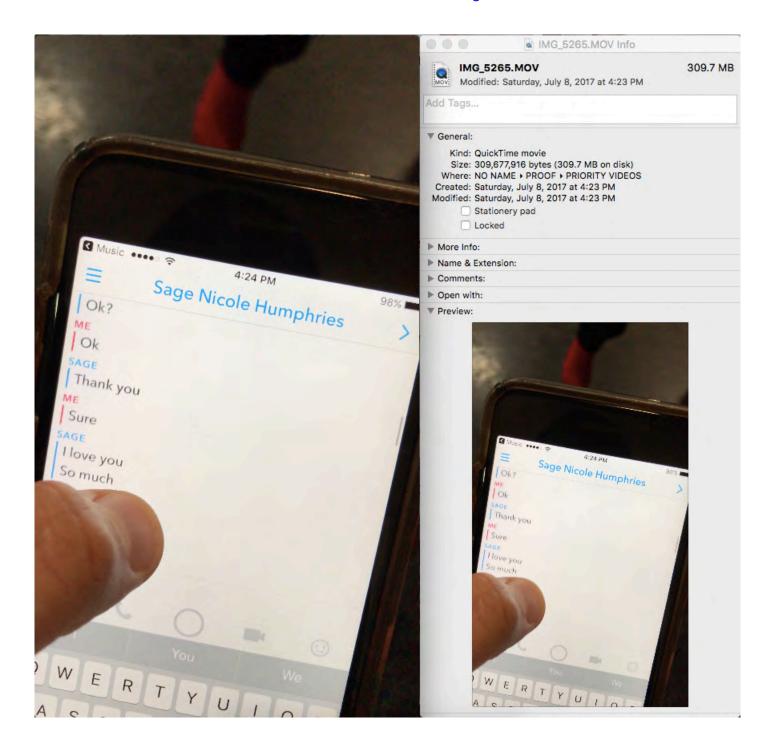


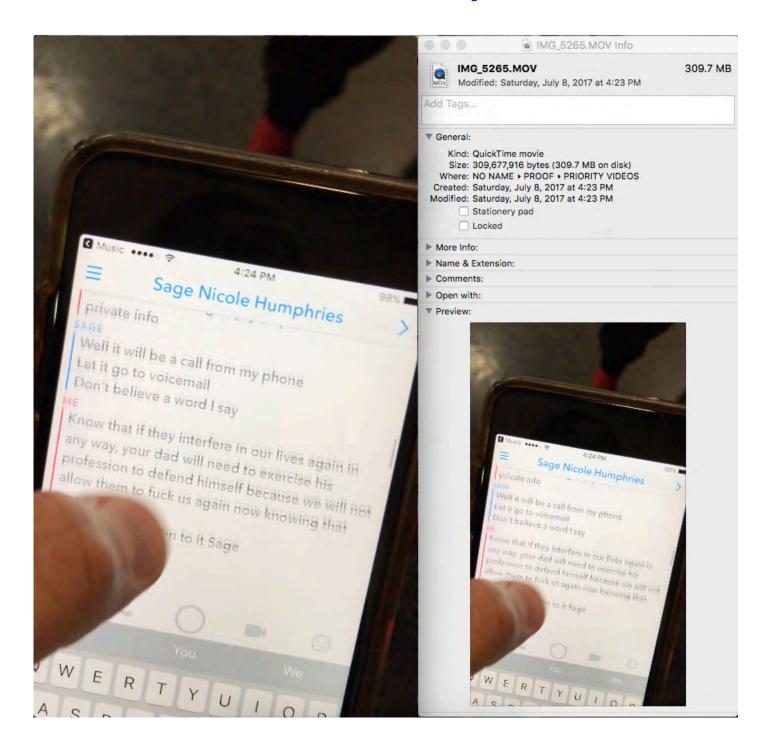


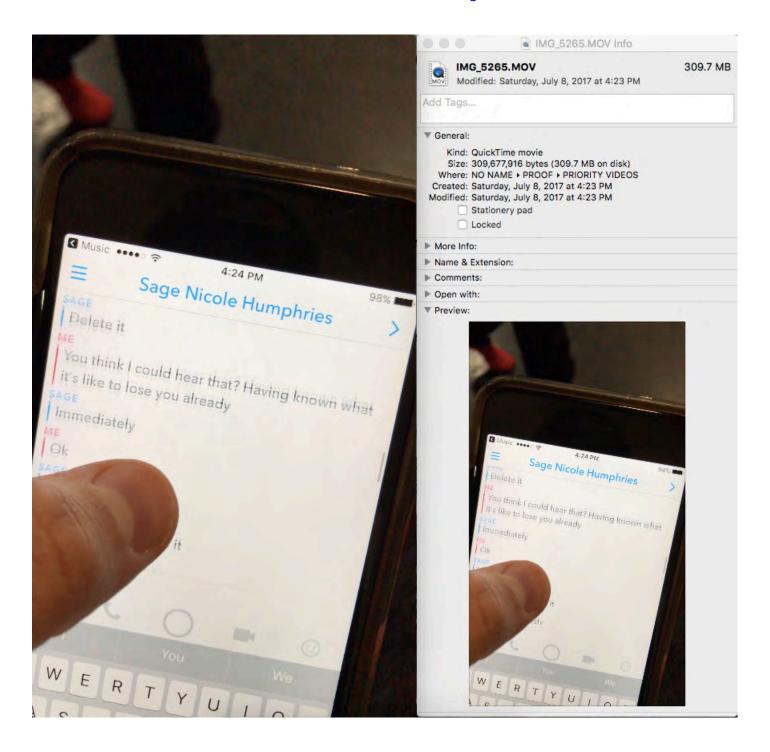


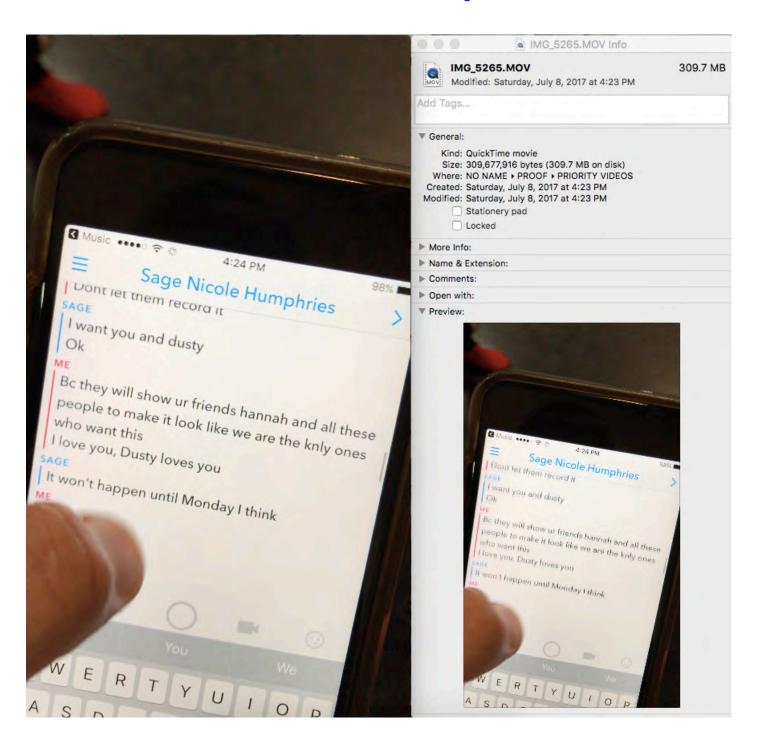


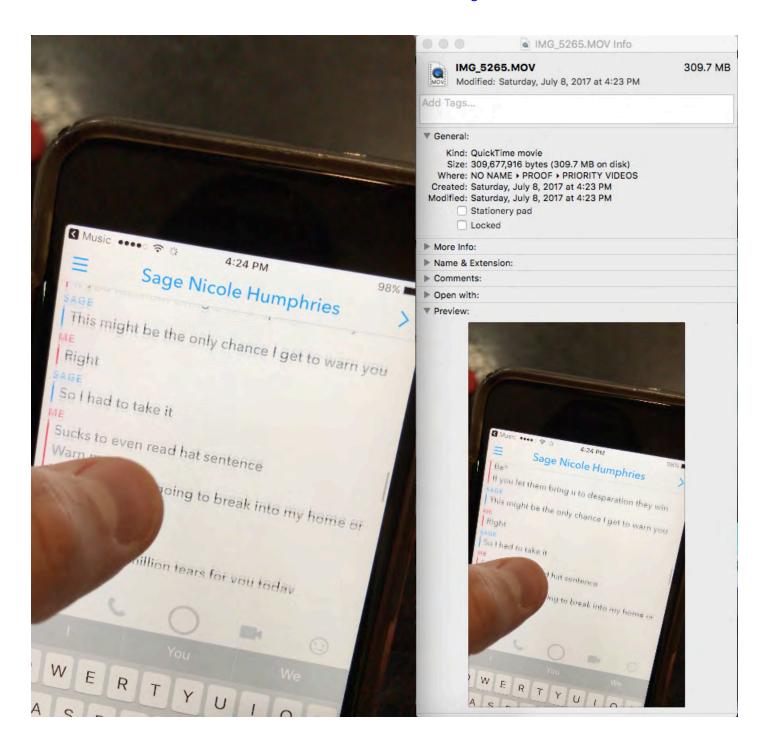


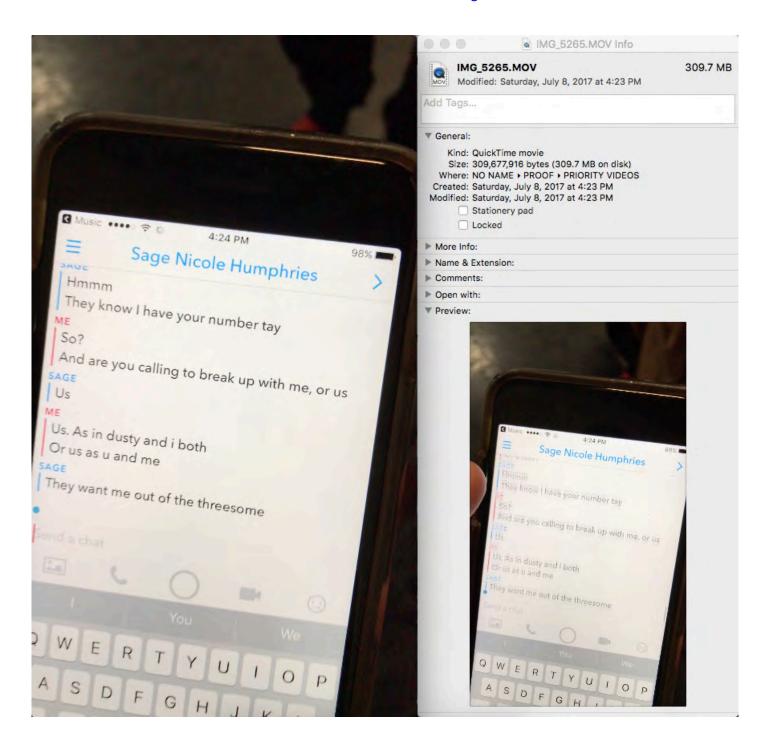














Dusty and Taylor

I have asked you to leave Sage and our family alone, Yet you contact her friends and stalk our home. Restraining orders are being filed.

If you continue to pursue my daughter we will go public to the media to expose your predatory behavior to ensure there are no other victims, and we will prosecute you to the full extent of the law We also have evidence of the hacking of her phone She knows about ALL of your previous relationships, as well as dusty's firing from the Birmingham ballet

She no longer wishes to associate with either of you.

We will notify you when I will come to retrieve my personal belongings from your house that were in Sages use (computer, piano, clothes) and I will be escorted by the Boston police.

Mike Humphries



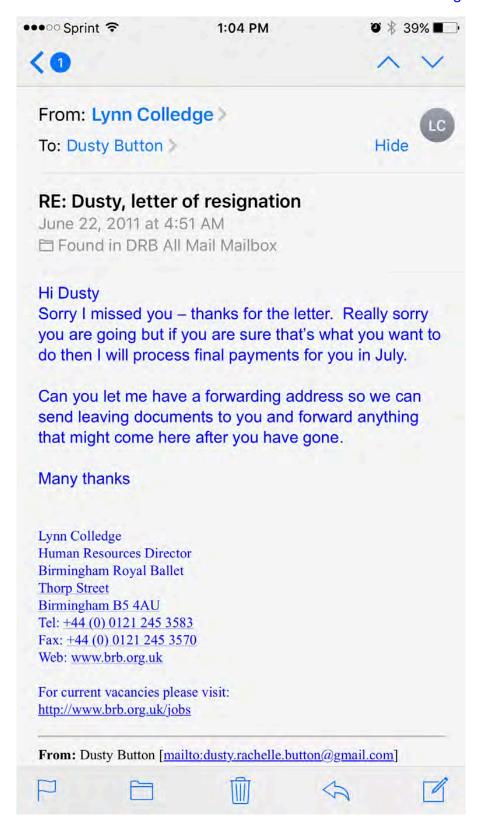


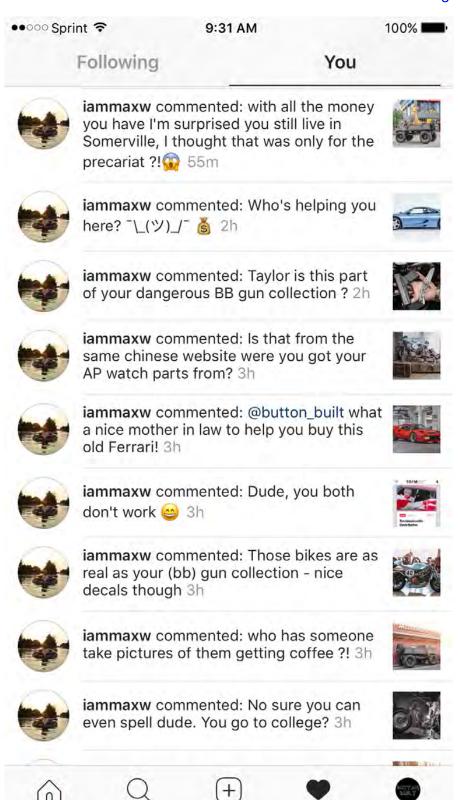


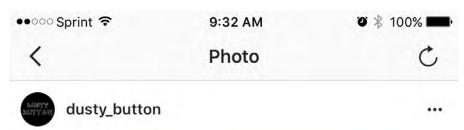
Text Message



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View Insights



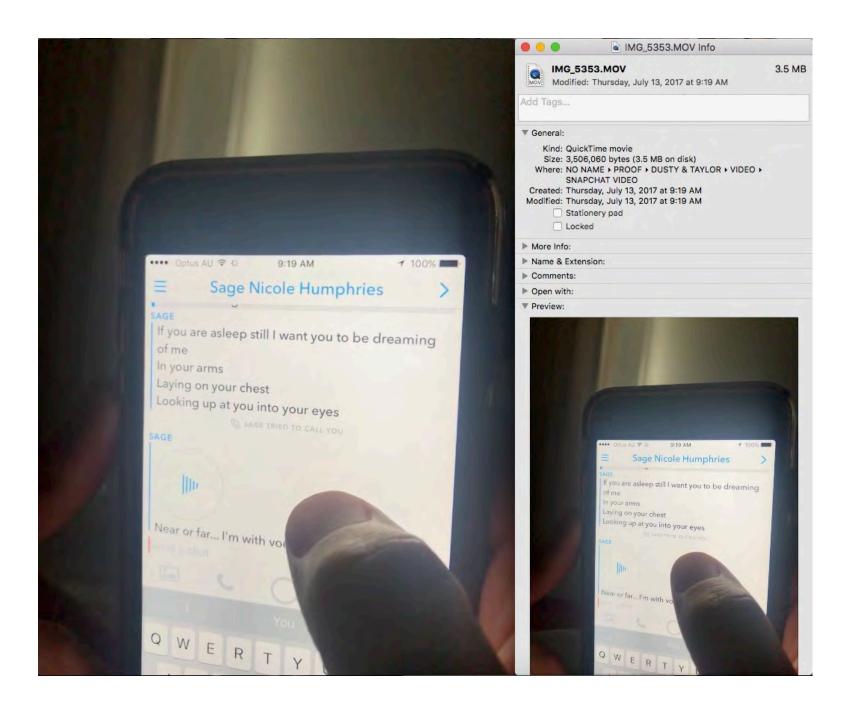
Liked by button_built, jormaelo and 9,045 others dusty_button @RedBull X #DustyButton X @Button_Built

View all 15 comments

iammaxw Wonder if redbull knows about you're creepy threesomes with little girls

5 DAYS AGO









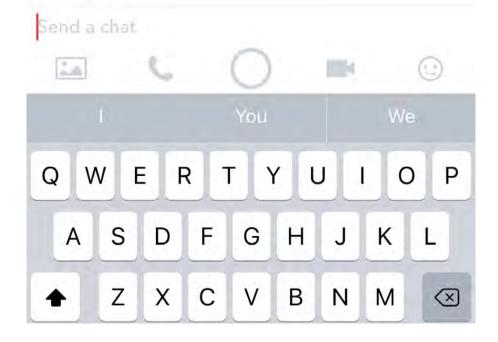


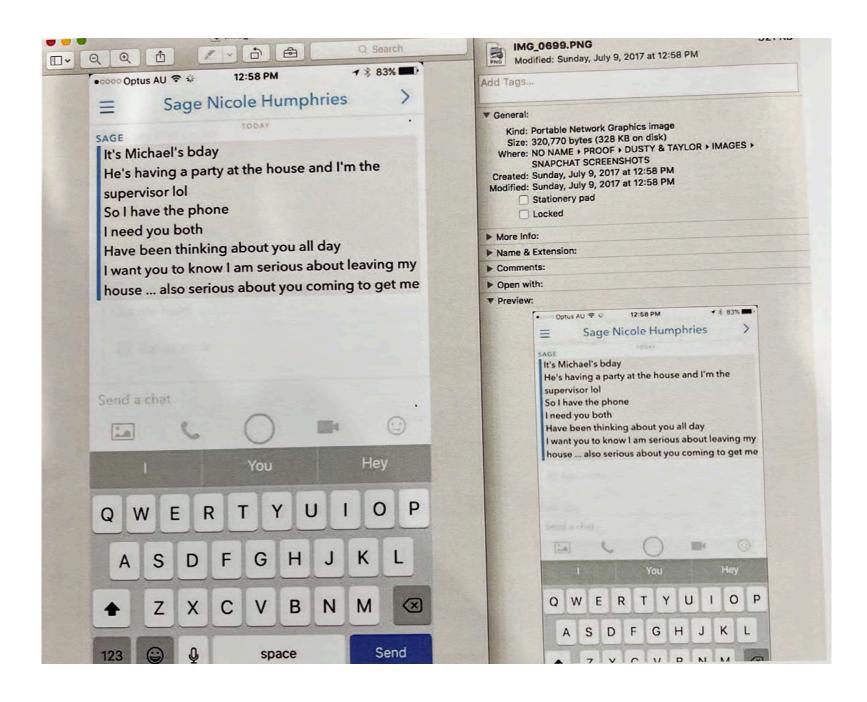
I want to kiss you everywhere Come onnnn I love you

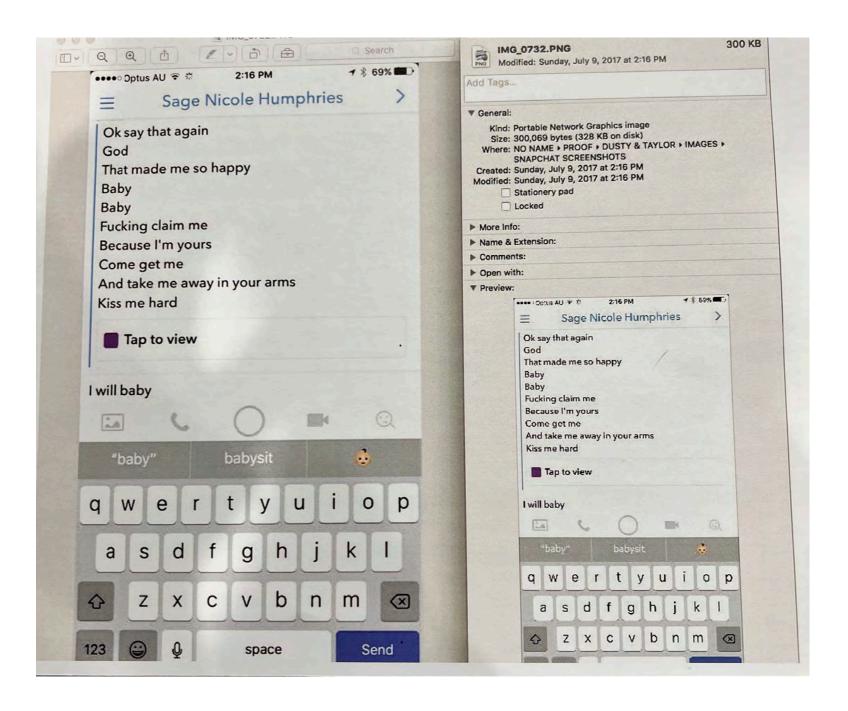
Press and hold to replay

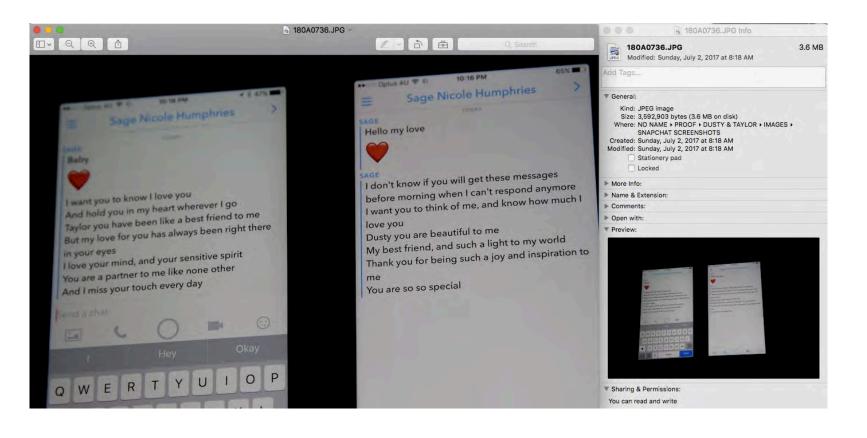
SAGE

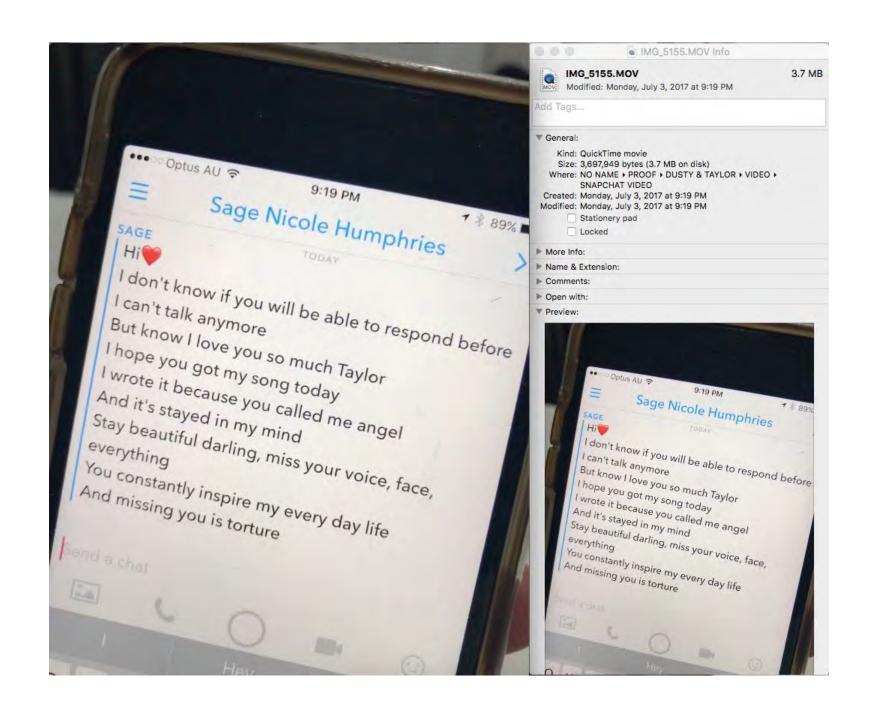
Taylor, good morning darling. There is nothing in this world I want more than to wake up in your arms. Turn over and kiss your face...
You are such an honest love, and have such a beautiful heart. I value it more than gold I hope you wake up in good spirits and feel me with you today

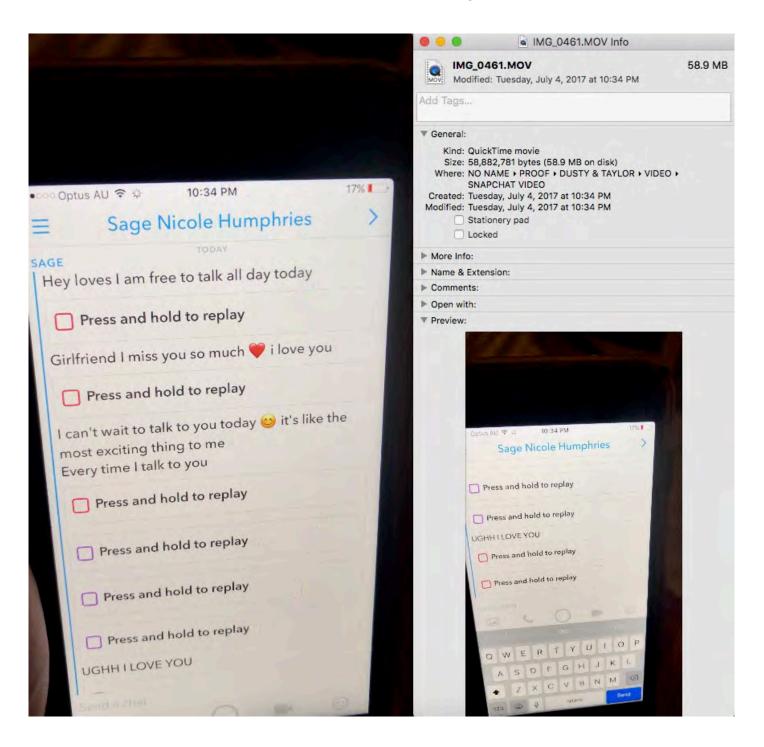


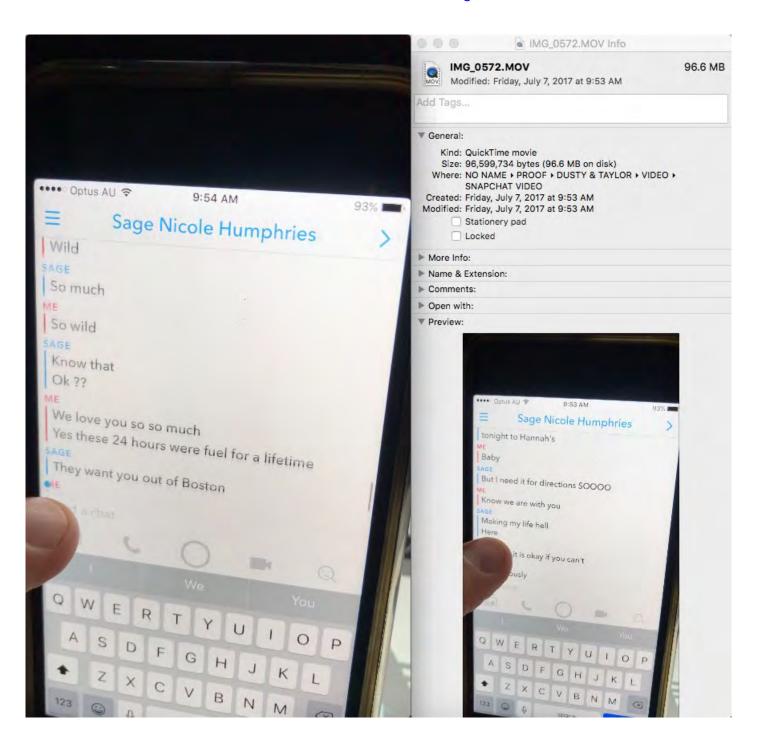


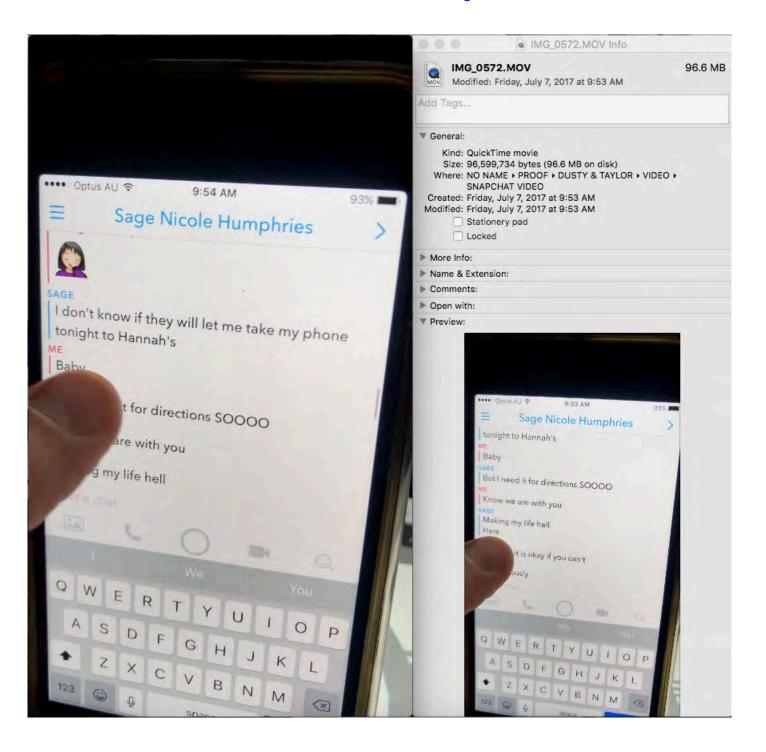


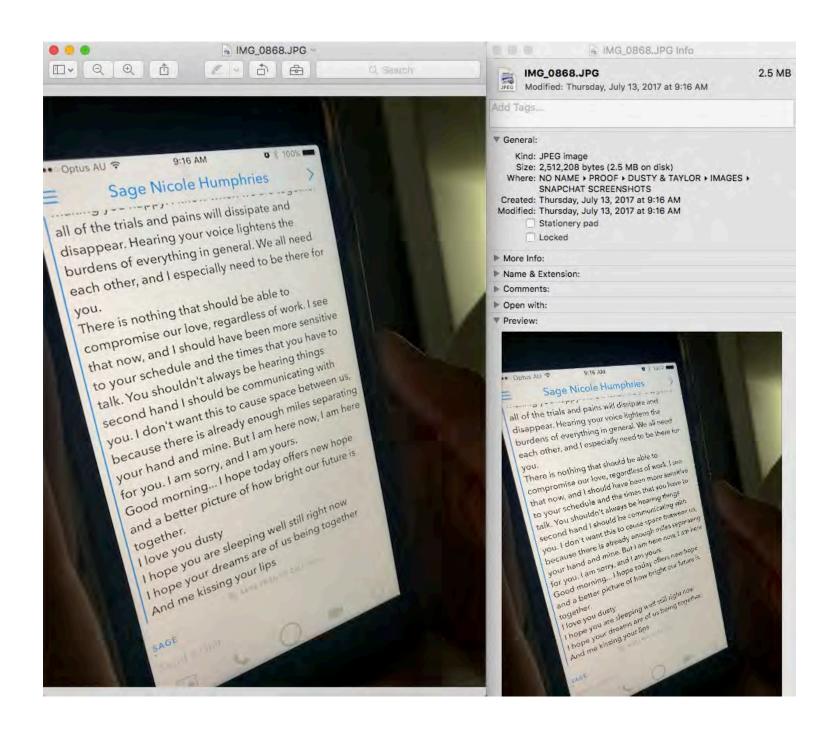


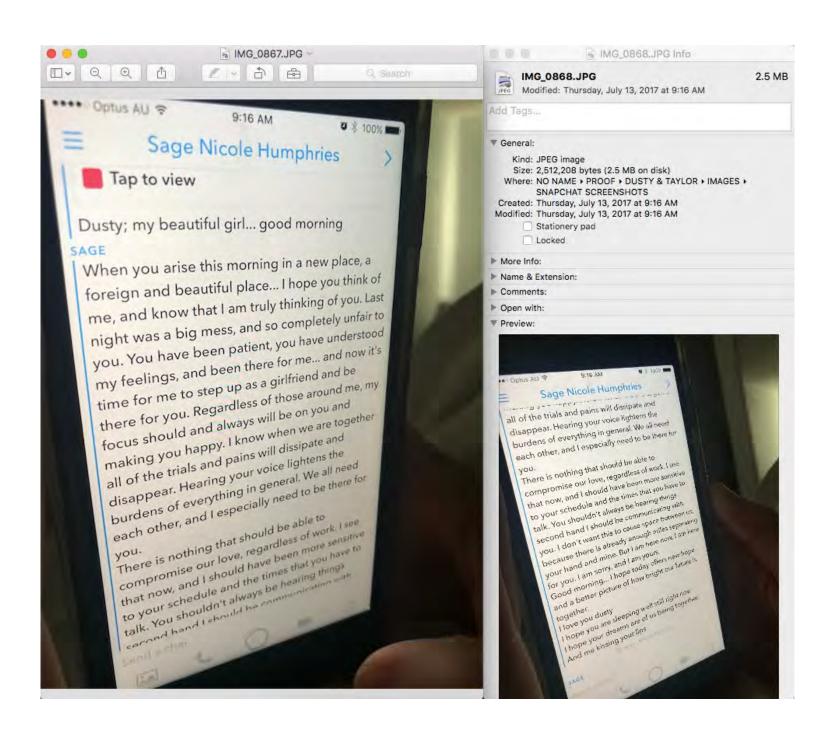


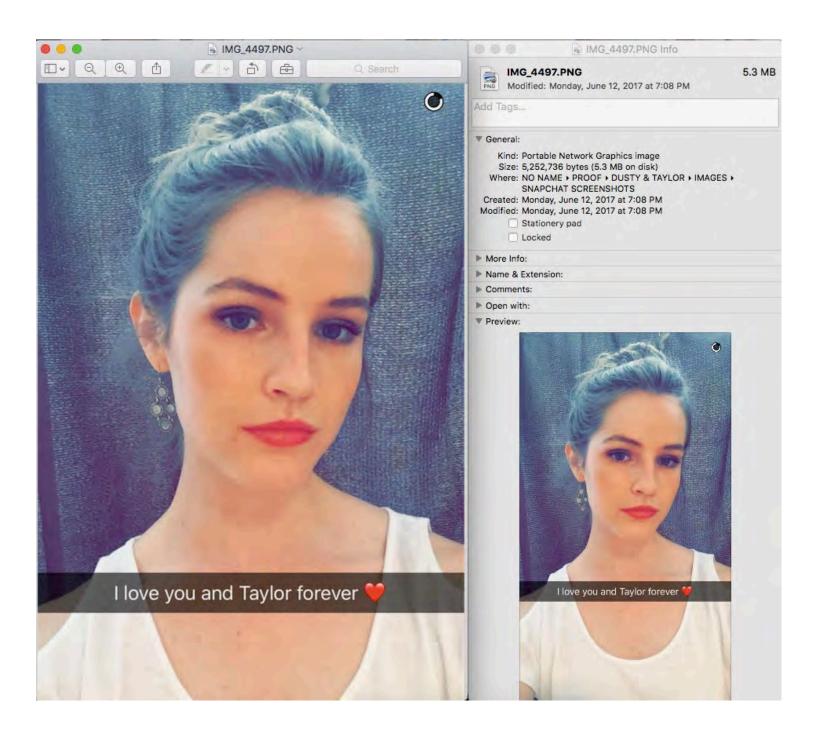


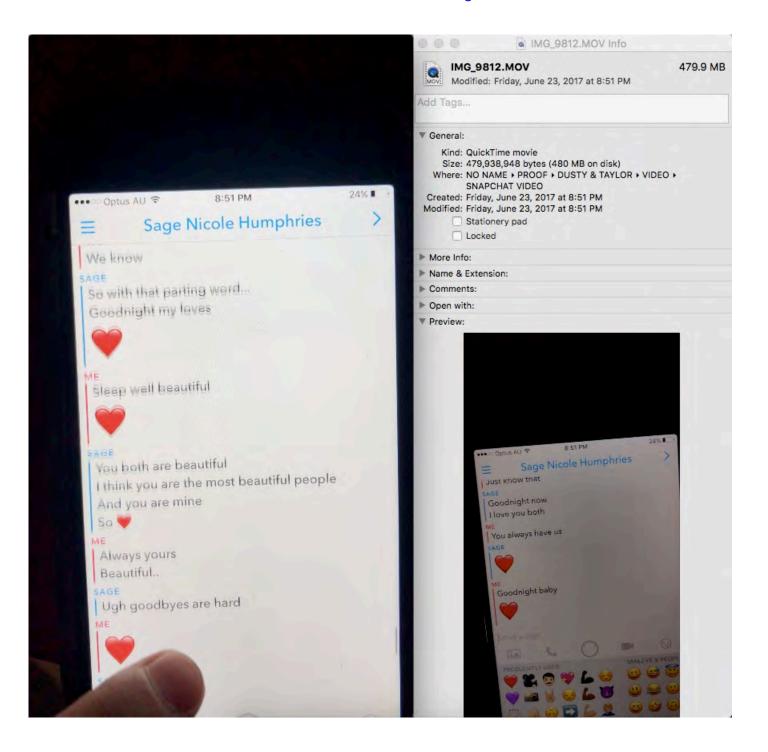


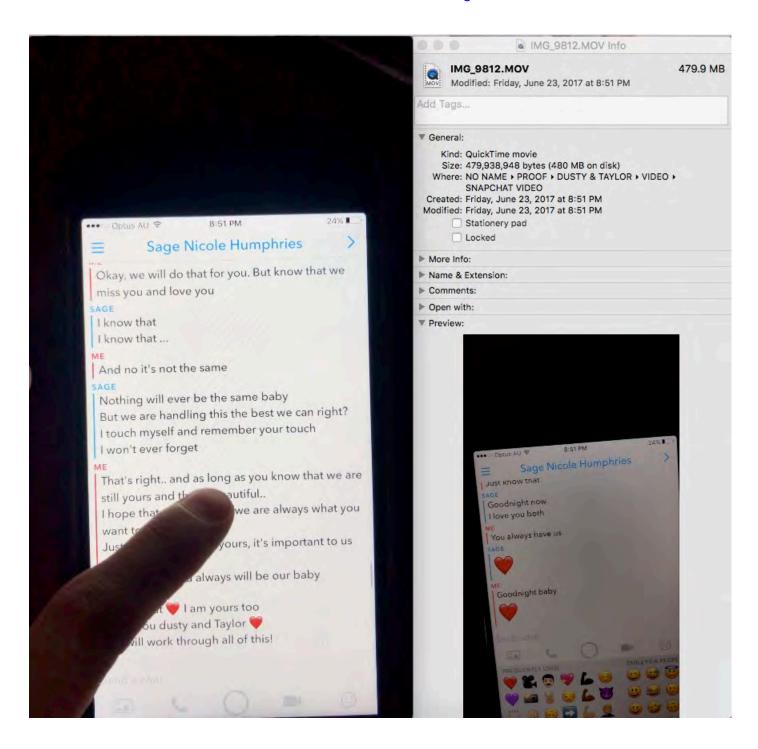


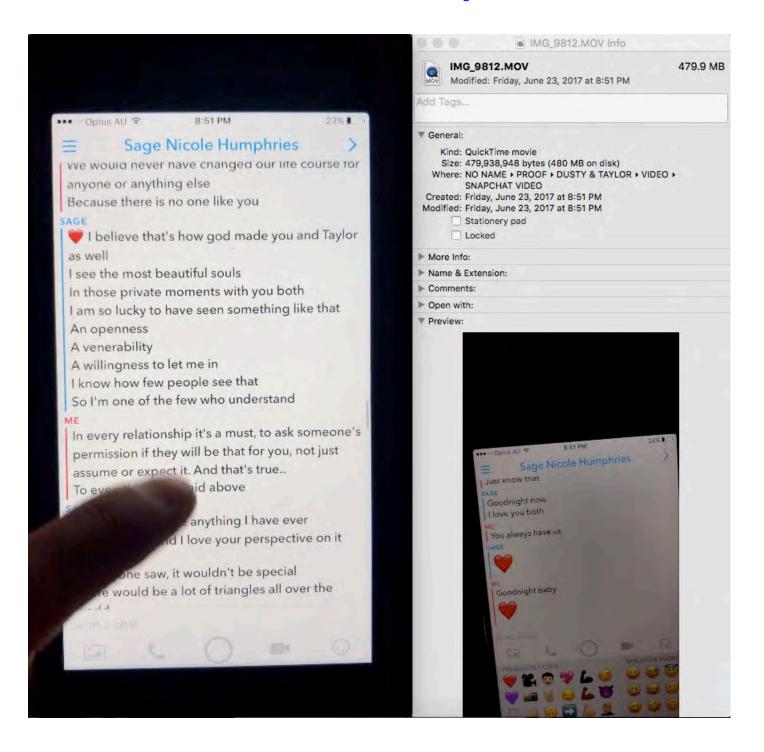


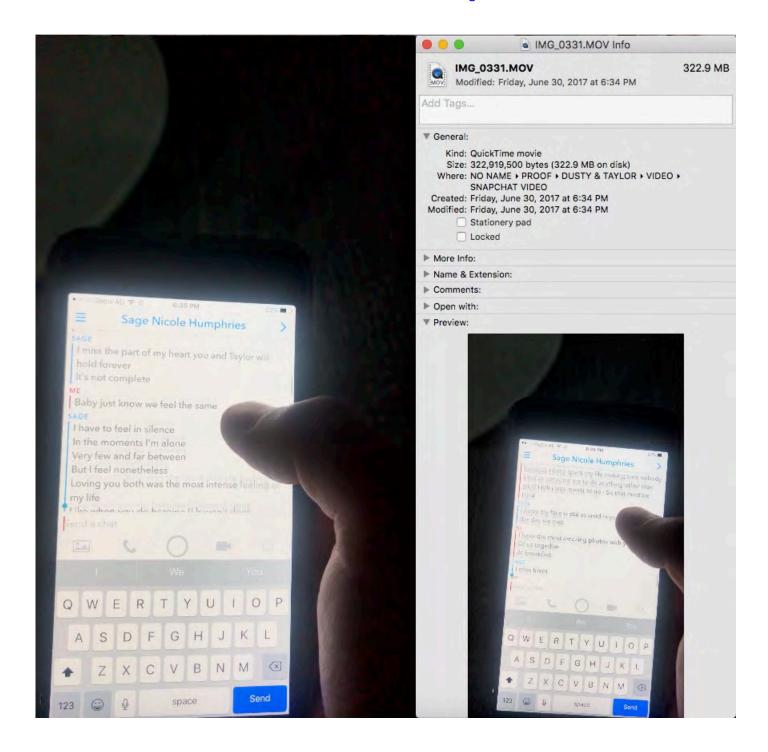


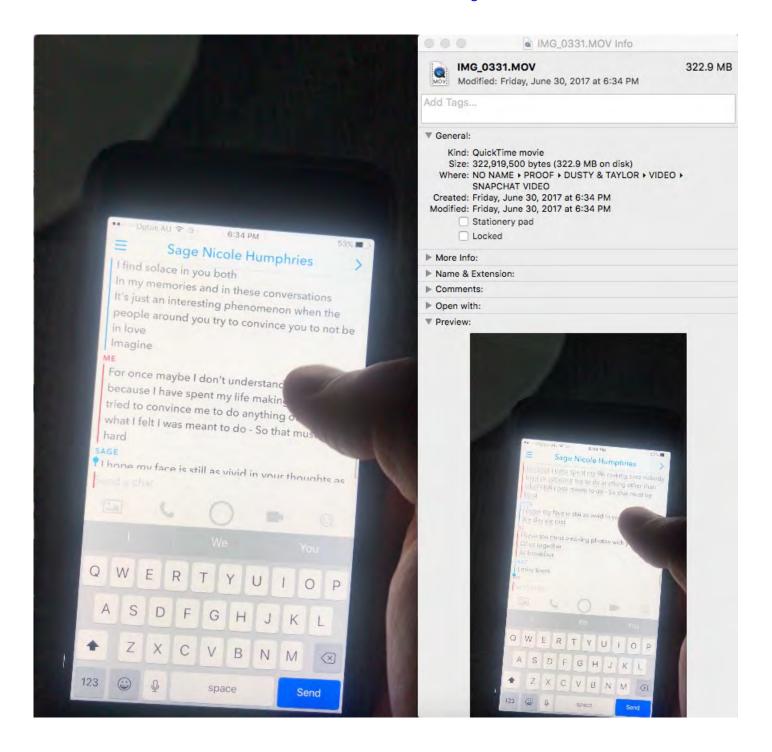


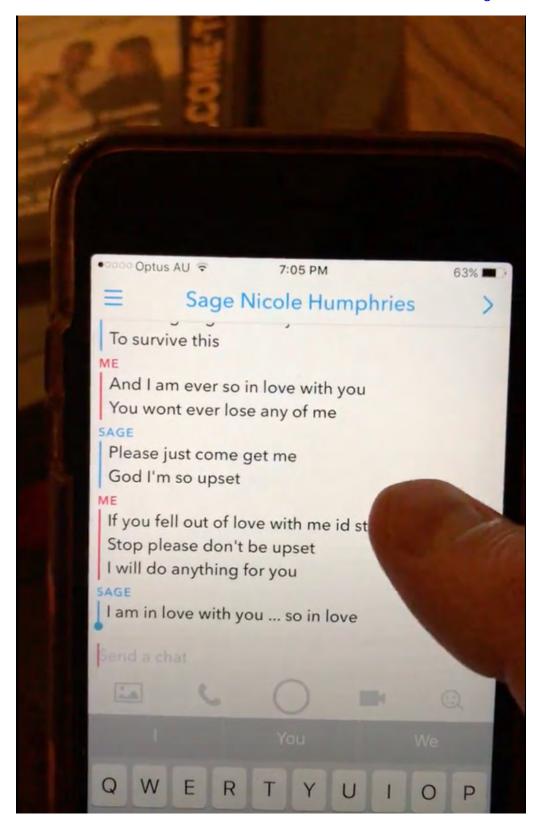


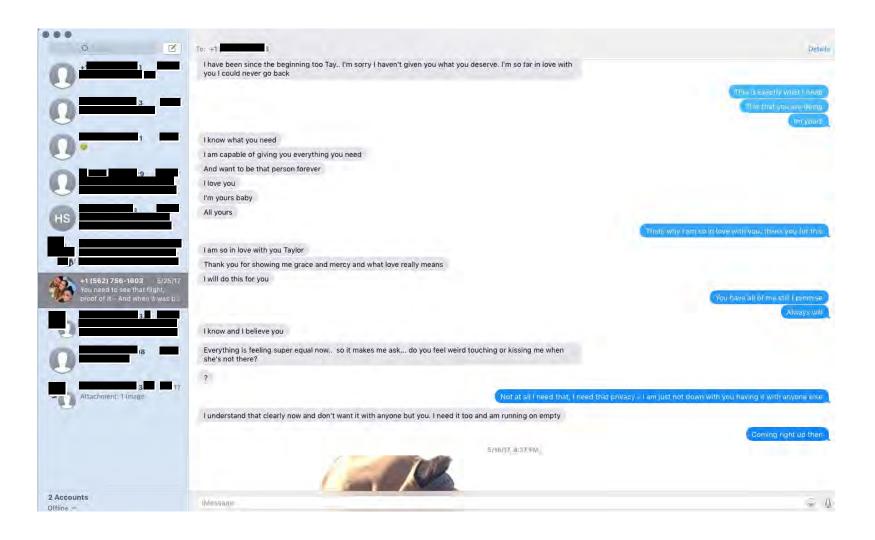


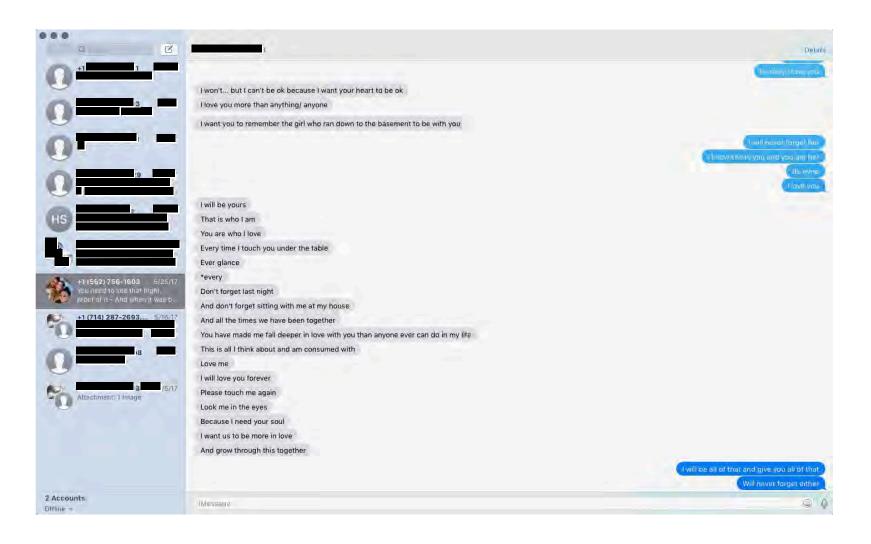


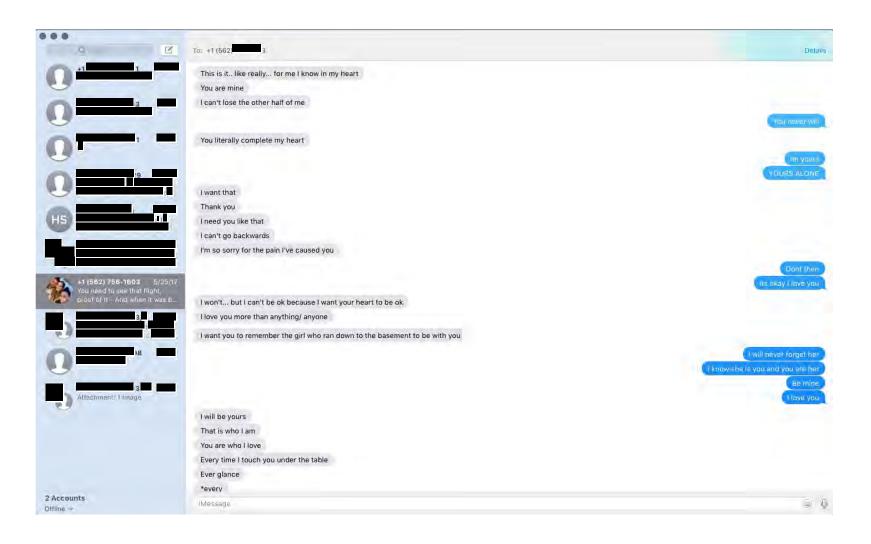


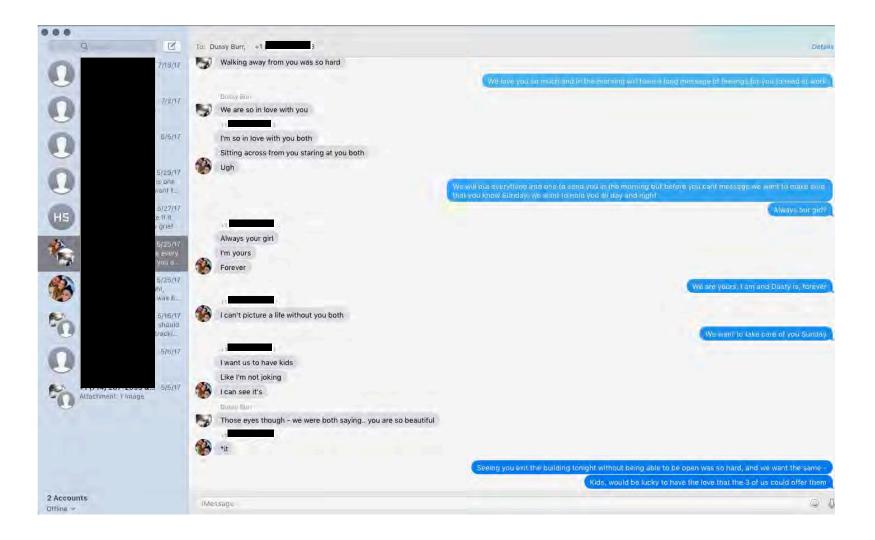


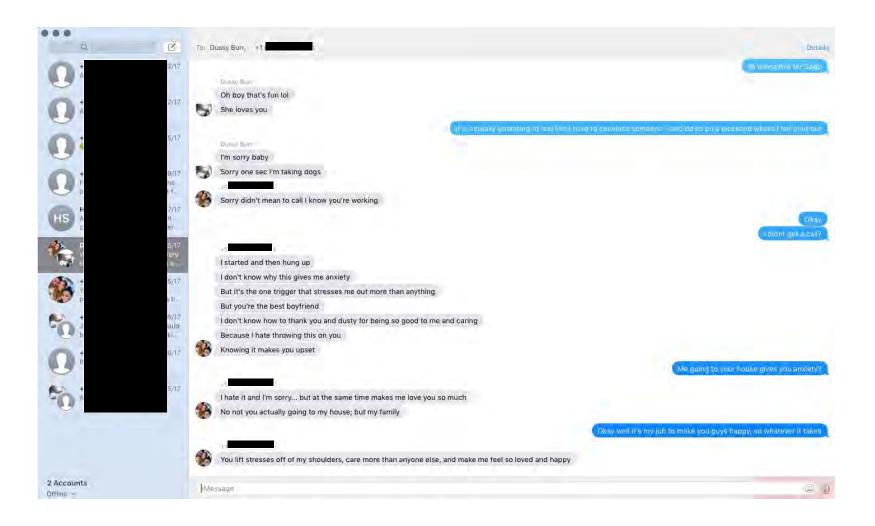


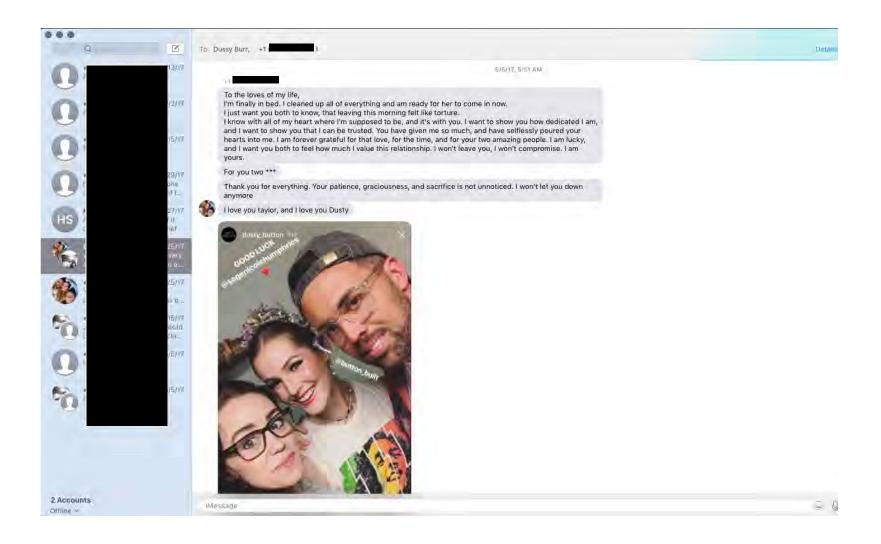


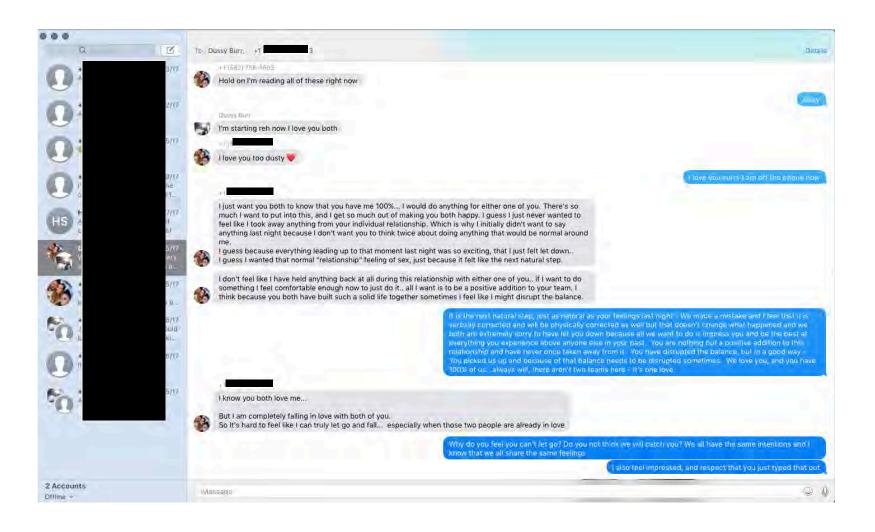










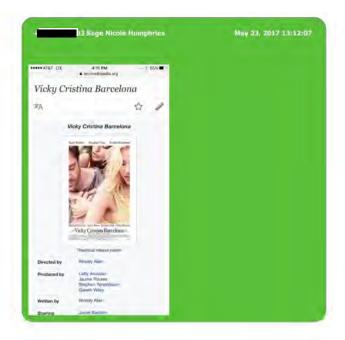




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Main Form

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POLICE

REQOFF!!

Note(s)

Note Type	Entered By	
CALL-TKR	05/28/2017 21:27:16	User ID
Narrative Descr		e249
man at abv apt war artisan way that ha	nts to speak to an ofc about a picture he rece s 30 automatic weapons in apt	eived -sts there is an apt or
Note Type	Entered By	Heav ID
INVALID	05/28/2017 21:27:23	User ID
Narrative Descri		auto
** APT 555 - QUA	DRIPLEGIC WILL NEED ASSISTANCE	**
Note Type	Entered By	
PAST INC	05/28/2017 21:27:23	User ID
Narrative Descri		auto
THERE ARE 60 DA	ST INCIDENTS AT 333 GREAT RIVER	RD
THERE THE OFF		
	Entered By	llo au ID
Note Type INFO	Entered By 05/28/2017 22:13:34	User ID e397

Officers and Units

Unit ID	Personnel Id	Officer Name	
E1	238	DOTTIN D	
E4	321	CLARK S	
S8	126	MARINO J	
	E1 E4	E1 238 E4 321	

Unit Statuses

CAD Units						
Unit ID	Status	Date/Time	Avail?	Location		
E1	RESP	21:37:01	N	Docation	Disp ID	
E4	RESP	21:37:01	N		e419	
E4	CLEAR	21:37:18	V		e419	
E4	RESP	21:40:53	NI NI		e419	
		21.10.33	11/		e419	

http://10.9.1.34/QED//cadpartner/cad97/cadincview/main.jsp?agency=SOM-PD&incnum=..

8/10/2017

L-0001299